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*Special Insurance Counsel to the Debtor and
Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,¹

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**SUMMARY SHEET TO THE THIRD INTERIM
AND FINAL FEE APPLICATION OF PILLSBURY WINTHROP
SHAW PITTMAN LLP, SPECIAL INSURANCE COUNSEL FOR THE DEBTOR
AND DEBTOR IN POSSESSION, FOR THE PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM JUNE 29, 2022
THROUGH AND INCLUDING AUGUST 21, 2023**

General Information

Name of Applicant:	Pillsbury Winthrop Shaw Pittman LLP ("Pillsbury")
Authorized to Provide Professional Services to:	The Debtor and Debtor-in-Possession
Date of Retention:	August 12, 2022, <i>nunc pro tunc</i> June 29, 2022
Prior Applications:	Pillsbury filed the First Interim Fee Application on December 15, 2022. ²

¹ The last four digits of the Debtor's federal tax identification number are 6792. The Debtor's mailing address is 250 Bradhurst Avenue, New York, New York 10039.

² The term "First Interim Fee Application" as used herein refers to the *First Interim Fee Application of Pillsbury Winthrop Shaw Pittman LLP, Special Insurance Counsel for the Debtor and Debtor-In-Possession, for the Payment of Compensation and Reimbursement of Expenses for the Period from June 29, 2022 through October 31, 2022* [Docket No. 314].

Pillsbury filed the Second Interim Fee Application
on April 14, 2023.³

Summary of Fees and Expenses Sought for the Third Interim Fee Period

Amount of Fees Sought as Actual, Reasonable, and Necessary for the Fee Period:	\$171,197.10
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary for the Fee Period:	\$0.00
Total Fees and Expense Reimbursement Requested for the Fee Period:	\$171,197.10
Period for which compensation and reimbursement is sought	March 1, 2023 through August 21, 2023 (the “Third Interim Fee Period”)

Summary of Fees and Expenses Sought for the Final Fee Period⁴

Amount of Fees Sought as Actual, Reasonable, and Necessary for the Fee Period (incl. Chapter 11 Plan Discount):	\$1,110,635.52
Amount of Expense Reimbursement Sought as Actual, Reasonable, and Necessary for the Fee Period:	\$9,076.84
Total Fees and Expense Reimbursement Requested for the Fee Period:	\$1,119,712.36
Period for which compensation and reimbursement is sought	June 29, 2022 through August 21, 2023 (the “Final Fee Period”)

³ The term “Second Interim Fee Application” as used herein refers to the *Second Interim Fee Application of Pillsbury Winthrop Shaw Pittman LLP, Special Insurance Counsel for the Debtor and Debtor-In-Possession, for the Payment of Compensation and Reimbursement of Expenses for the Period from November 1, 2022 through February 28, 2023* [Docket No. 438].

⁴ The adjustments by the United States Trustee to the fees and expenses in the First and Second Interim Fee Applications are reflected in the amounts provided here. For the First Interim Fee Period adjustments of \$8,554.40 to fees and \$133.34 to expenses were made and for the Second Interim Fee Period an adjustment of \$1,869.00 to fees was made.

Total Fees and Expenses Allowed Pursuant to Prior Applications

Total Allowed Fees Paid to Date:	\$989,692.35
Total Allowed Expenses Paid to Date:	\$9,076.84
Total Allowed Fees and Expenses Paid to Date:	\$998,769.19

Total Fees and Expenses Paid to Applicant Pursuant to Monthly Statements During the Third Interim Fee Period

Fees Sought for the Third Interim Fee Period Already Paid Pursuant to Monthly Fee Statements but Not Yet Allowed (80% of fees):	\$84,447.28
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Expenses Sought for the Third Interim Fee Period Already Paid Pursuant to Monthly Fee Statements but Not Yet Allowed (100% of expenses):	\$0.00
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Total Fees and Expenses Sought for the Third Interim Fee Period Already Paid Pursuant to Monthly Fee Statements but Not Yet Allowed:	\$84,447.28
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Total Fees and Expenses Sought for the Third Interim Fee Period Not Yet Paid:	\$86,749.28
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Summary of Rates and Other Related Information for this Fee Period

Blended Rate in this Application for All Attorneys:	\$949.81
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Blended Rate in this Application for All Timekeepers:	\$879.74
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Number of Timekeepers Included in this Application:	6
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Number of Attorneys in this Application 0
Not Included in Staffing Plan Discussed
with Client:
Difference Between Fees Budgeted and \$158,802.90 below budget
Compensation Sought for this Period:

Number of Attorneys Billing Fewer than 4
15 Hours to the Case During the Fee
Period
Increase in Rates Since Date of Retention: none

This is an: ____ monthly X interim X final application

Summary of Prior Monthly Fee Statements

Date Filed & Docket No.	Period Covered	Total Compensation and Expenses Incurred for Period Covered		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date		Holdback Fees Paid
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees (80%)	Expenses (100%)	
9/23/2022 Doc. 215	6/29/2022 – 7/31/2022	\$125,890.70	\$4,583.43	\$100,712.56	\$4,583.43	\$100,712.56	\$4,583.43	\$25,178.14
9/20/2022 Doc. 208	8/1/2022 – 8/31/2022	\$116,662.70	\$330.23	\$93,330.16	\$330.23	\$93,330.16	\$330.23	\$23,332.54
10/20/2022 Doc. 253	9/1/2022 – 9/30/2022	\$121,623.40	\$2,643.67	\$97,298.72	\$2,643.67	\$97,298.72	\$2,643.67	\$24,324.68
11/22/2022 Doc. 300	10/1/2022 – 10/31/2022	\$374,720.95	\$278.05	\$299,776.76	\$278.05	\$299,776.76	\$278.05	\$74,944.19
Total for First Interim Fee Application¹		\$738,897.75	\$7,835.38	\$591,118.20	\$7,835.38	\$591,118.20	\$7,835.38	\$147,779.55
12/20/2022 Doc. 322	11/1/2022- 11/30/2022	\$72,154.60	\$1,354.50	\$57,723.68	\$1,354.50	\$57,723.68	\$1,354.50	\$14,430.92
1/20/2023 Doc. 363	12/1/2022- 12/31/2022	\$98,914.80	\$0.00	\$79,131.84	\$0.00	\$79,131.84	\$0.00	\$19,792.96
2/21/2023 Doc. 388	1/1/2023- 1/31/2023	\$41,992.50	\$20.30	\$33,594.00	\$20.30	\$33,594.00	\$20.30	\$8,398.50
3/20/2023 Doc. 406	2/1/2023- 2/28/2023	\$46,277.10	\$0.00	\$37,021.68	\$0.00	\$37,021.68	\$0.00	\$9,255.42

¹ After filing the First Interim Fee Application (as defined herein), in response to informal objections that the U.S. Trustee raised, Pillsbury agreed voluntarily to reduce its fees by \$8,554.40 and its expenses by \$133.34 for an aggregate reduction of \$8,687.74. This reduction is reflected in the Second Interim Fee Period.

Total for Second Interim Fee Application²	\$259,339.00	\$1,374.80	\$207,471.20	\$1,374.80	\$207,741.20	\$1,374.80	\$51,877.80
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Summary of Prior Monthly Fee Statements for the Third Interim Fee Period

Date Filed & Docket No.	Period Covered	Total Compensation and Expenses Incurred for Period Covered		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date		Holdback Fees Requested (20%)
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees (80%)	Expenses (100%)	
4/20/2023 Doc. 447	3/1/2023 – 3/31/2023	\$51,900.10	\$0.00	\$41,520.08	\$0.00	\$41,520.08	\$0.00	\$10,380.02
5/22/2023 Doc. 498	4/1/2023 – 4/30/2023	\$39,331.40	\$0.00	\$31,465.12	\$0.00	\$31,465.12	\$0.00	\$7,866.28
6/20/2023 Doc. 541	5/1/2023 – 5/31/2023	\$14,327.60	\$0.00	\$11,462.08	\$0.00	\$11,462.08	\$0.00	\$2,865.52
7/21/2023 Doc. 576	6/1/2023 – 6/30/2023	\$48,967.20	\$0.00	\$39,173.76	\$0.00	0.00	\$0.00	\$9,793.44
8/21/2023 Doc. 615	7/1/2023 – 7/31/2023	\$15,384.20	\$0.00	\$12,307.36	\$0.00	0.00	\$0.00	\$3,076.84
9/20/2023 Doc 631	8/1/2023 – 8/21/2023	\$1,286.60	\$0.00	\$1,029.28	\$0.00	0.00	\$0.00	\$257.32
Total for Third Interim Fee Application		\$171,197.10	\$0.00	\$136,957.68	\$0.00	\$84,447.28	\$0.00	\$34,239.42

² After filing the Second Interim Fee Application (as defined herein), in response to informal objections that the U.S. Trustee raised, Pillsbury agreed voluntarily to reduce its fees by \$1,869.00.

Summary of Objections to Monthly Fee Statements: None

Compensation Sought in this Application Not Yet Paid: \$86,749.82

Less Credit On Account of the Chapter 11 Plan Discount:³ (\$48,374.93)

Net Amount Sought for Payment From the Debtor: \$38,374.89

³ Due to the Chapter 11 Plan Discount, Pillsbury is holding a credit of \$48,374.93, which will be applied to unpaid amounts owed under this Application.

**Compensation By Professional for the Third Interim Fee Period
March 1, 2023 through August 21, 2023**

Partners and Counsel	T36.itle	Department	Year Admitted	Hourly Billing Rate (\$)¹	Total Billed Hours	Total Compensation (\$)
Joseph D. Jean	Partner	Litigation	1998	1,335.00	7.9	10,546.50
Peter M. Gillon	Partner	Litigation	1984	1,097.00	1.3	1,426.10
Scott D. Greenspan	Sr. Counsel	Litigation	1996	944.00	153.6	144,998.40
Total Partners and Counsel:					162.8	156,971.00

Associates	Title	Department	Year Admitted	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Andrew V. Alfano	Sr. Associate	Insolvency	2017	833.00	3.1	2,582.30
Total Associates:					3.1	2,582.30

Staff Attorneys	Title	Year Admitted	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Bryan Coffey	Attorney	2012	442.00	3.9	1,723.80
Total Staff Attorneys:				3.9	1,723.80

Sr. Law Clerks, Paralegals and Non-Legal Staff	Title	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Stephanie Korchinski	Paralegal	400.00	24.8	9,920.00
Total Sr. Law Clerks, Paralegals and Non-Legal Staff:			24.8	9,920.00

PROFESSIONALS	BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Partners and Counsel	964.20	162.8	156,971.00
Associates	833.00	3.1	2,582.30
Staff Attorneys	442.00	3.9	1,723.80

¹ All "Hourly Billing Rate (\$)" information reflects a 15% discount from the standard hourly rates except for paralegals which were discounted by 15% and capped at \$400.00 per hour, whichever resulted in a lower rate. Pillsbury agreed to increase its discount from 10% to 15% after the First Fee Application at the Debtor's request due to its financial circumstances.

Paralegals/Non-Legal Staff	400.00	24.8	9,920.00
Blended Attorney Rate	949.81		
Blended Rate All Timekeepers	879.74		
Total		194.6	171,197.10

Compensation by Project Category for the Third Interim Fee Period
March 1, 2023 through August 21, 2023

Task Code	Project Category	Total Hours	Total Fees (\$)
701	Case Administration	9.9	3,960.00
702	Asset Analysis and Recovery	41.6	33,543.10
705	Fee/Employment Applications	6.0	3,742.30
707	Mediation	1.7	2,113.10
708	Claims Administration and Objections	24.1	22,097.60
709	Plan and Disclosure Statement	99	93,660.60
710	Litigation	10.6	10,475.60
711	Court Hearings	1.7	1,604.80
	Total:	194.6	171,197.10

Expense Summary for the Third Interim Fee Period
March 1, 2023 through August 21, 2023

Expenses Category	Total Expenses (\$)
Business Expenses	
Communications	
Corporate Services	
Duplicating Expenses and Word Processing	
Information Retrieval Services	
Local Transportation Expenses	
Mail & Messengers	
Out-of-Town Travel	
Overtime Expenses	
Professional Services	
Reporting	
TOTAL:	0.00

**Compensation By Professional for the
Final Fee Period (June 29, 2022 through August 21, 2023)¹²**

Partners and Counsel	Title	Department	Year Admitted	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Joseph D. Jean	Partner	Litigation	1998	1,570.00	1,413.00	75.8	1,335.00	36.2	155,432.40
Peter M. Gillon	Partner	Litigation	1984	1,290.00	1,161.00	0.0	1,097.00	28.2	30,935.40
Barbara Crouch	Senior Counsel	Litigation	1990	1,225.00	1,103.00	121.1	1,041.00	0.0	133,573.30
Barry Fleishman	Senior Counsel	Litigation	1985	1,395.00	1,156.00	16.4	1,186.00	0.0	18,958.40
Scott D. Greenspan	Senior Counsel	Litigation	1996	1,110.00	999.00	277	944.00	313.9	573,440.60
Total Partners and Counsel:						490.3		378.3	911,944.10

¹ Following discussions with the U.S. Trustee, Pillsbury agreed to reduce its fees by a total of \$10,534.40 in connection with the First Interim Fee Application and the Second Interim Fee Application. Because these reductions were not assigned to specific timekeepers, task codes, or billing entries, the data reported in these summary charts reflects all time initially requested in prior fee applications and excludes those reductions. For the avoidance of doubt, Pillsbury does not seek payment of the \$10,534.40 in reductions previously made.

² As set forth in the Chapter 11 Plan, Pillsbury has agreed to apply a discount to its fees incurred in the Chapter 11 Case in an amount equal to the greater of (a) 15% and (b) the current applicable discount in place pursuant to Pillsbury's retention application approved by the Bankruptcy Court (the "Chapter 11 Plan Discount"). Because this further discount was not assigned to specific timekeepers, task codes, or billing entries, the data reported in these summary charts reflects all time initially requested in prior fee applications and excludes that discount.

Associates	Title	Department	Year Admitted	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Andrew V. Alfano	Sr. Associate	Insolvency	2017	980.00	882.00	8.7	833.00	7.0	13,504.40
Philip He	Associate	Litigation	2018	795.00	716.00	303.3	676.00	27.3	235,617.60
Jesse N. Vazquez	Associate	Litigation	2018	730.00	657.00	34.5	621.00	4.0	25,150.50
Krysta Woodcock	Associate	Litigation	2022	710.00	639.00	48.5	604.00	7.5	332,521.50
Total Associates:						395		45.8	309,794.00

Staff Attorneys	Title	Year Admitted	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Bryan J. Coffey	Attorney		520.00	468.00	29.2	442.00	7.5	16,980.60
Total Associates:					29.2		7.5	16,980.60

Sr. Law Clerks, Paralegals and Non-Legal Staff	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Kristina Sgambati	Sr. Law Clerk	600.00	540.00	6.2	510.00	0.0	3,348.00
Patrick Blood	Sr. Law Clerk	600.00	540.00	20.6	510.00	0.0	11,124.00
April Iniguez	Paralegal	425.00	383.00	72.1	361.00	1.3	28,083.60

Sr. Law Clerks, Paralegals and Non-Legal Staff	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Stephanie Korchinski	Paralegal	575.00 ³	380.00	4.6	400.00	45.3	35,868.00
Total Associates:				103.5		46.6	78,423.60

PROFESSIONALS	BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Partners and Counsel	1,049.90	868.6	911,944.10
Associates	702.80	440.8	309,794.00
Staff Attorney	462.69	36.7	16,980.60
Paralegals/Non-Legal Staff	412.54	190.1	78,423.60
Blended Attorney Rate	920.23		
Blended Rate All Timekeepers	857.40		
Total:		1,536.2	1,317,142.30

³ Paralegal billing rates were discounted by fifteen percent (15%) and subject to a \$400.00 per hour cap. Upon increasing the discount to 15% the \$400.00 paralegal cap was, inadvertently, discounted an additional 5% to \$380.00 for one monthly billing period.

**Compensation by Task Code for the
Final Fee Period (June 29, 2022 through August 21, 2023)**

Task Code	Project Category	Total Hours	Total Fees (\$)
701	Case Administration	107.1	58,932.00
702	Asset Analysis and Recovery	725.5	598,826.70
705	Fee/Employment Applications	31.4	20,508.40
706	Fee/Employment Objections	1.7	1,217.20
707	Mediation	417.9	405,898.90
708	Claims Administration and Objections	35.7	28,825.20
709	Plan and Disclosure Statement	198.5	186,217.90
710	Litigation	11.4	11,048.40
711	Court Hearings	7.0	7,307.60
	Total (excl. Chapter 11 Plan Discount & Voluntary Reductions):¹	1,536.2	1,318,782.30

¹ Because the voluntary reductions and discounts were not assigned to a specific task code, the amounts in this chart excludes those reductions and discounts.

**Expense Summary for the
Final Fee Period (June 29, 2022 through August 21, 2023)**

Expenses Category	Total Expenses (\$)
Information Retrieval Services	6,270.57
Duplicating & Word Processing	2,178.16
Business Expenses	761.45
First Interim Fee Application Voluntary expense adjustment requested by UST.	(133.34)
TOTAL:	9,076.84

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*Special Insurance Counsel to the Debtor and
Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,¹

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**THIRD INTERIM AND FINAL FEE APPLICATION OF
PILLSBURY WINTHROP SHAW PITTMAN LLP, SPECIAL
INSURANCE COUNSEL FOR THE DEBTOR AND DEBTOR-IN-POSSESSION, FOR
THE PAYMENT OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM JUNE 29, 2022 THROUGH AUGUST 21, 2023**

TO THE HONORABLE SEAN H. LANE,
UNITED STATES BANKRUPTCY JUDGE:

Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”), special insurance counsel for the above-captioned debtor and debtor in possession (the “Debtor”), hereby submits its third interim and final fee application (the “Fee Application”), pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2016-1 of the Local Rules for the Southern District of New York (the “Local Rules”), for allowance of compensation

¹ The last four digits of the Debtor’s federal tax identification number are 6792. The Debtor’s mailing address is 250 Bradhurst Avenue, New York, New York 10039.

for professional services provided in the amount of \$1,110,635.52 and reimbursement of actual and necessary expenses in the amount of \$9,076.84 that Pillsbury incurred for the period from June 29, 2022 through August 21, 2023 for the Final Fee Period, including \$171,197.10 in fees and \$0 in expenses incurred for the period from March 1, 2023 to August 21, 2023 for the Third Interim Fee Period. In support of this Fee Application, Pillsbury submits the declaration of Joseph D. Jean, a partner of Pillsbury, regarding Pillsbury's compliance with the Fee Guidelines (as defined below) (the "Jean Declaration"), which is attached hereto as **Exhibit A**. In further support of this Fee Application, Pillsbury respectfully states as follows:

Preliminary Statement

1. During the Third Interim Fee Period and since the commencement of the Debtor's chapter 11 case (the "Chapter 11 Case"), Pillsbury's professionals have represented the Debtor professionally, diligently, and efficiently, advising the Debtor on a wide variety of complex matters and helping to ensure that the Debtor both maximized the value of its estate and minimized its time in chapter 11. As the Court is aware, the Debtor successfully confirmed the First Amended Chapter 11 Plan of Reorganization of Madison Square Boys and Girls Club, Inc.², (Docket No. 614) (the "Chapter 11 Plan"), despite many contentious issues present at the outset of this Chapter 11 Case that threatened to delay progress, and ushered settlements with both the Committee and Rockefeller. On August 18, 2023, the Court entered an order confirming the Plan and approving the Disclosure Statement on a final basis, the plan became effective on August 21, 2023 (the "Effective Date").

2. During the Third Interim Fee Period, Pillsbury:

- (a) continued to provide Debtor with advice concerning its rights to insurance coverage under liability insurance policies issued to the Debtor that may

² Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to such terms in the Plan.

respond to and provide coverage for the claims, demands, and/or lawsuits asserted against the Debtor under the New York Child Victims Act (the “CVA Claims”);

- (b) analyzed, reviewed and attempted to resolve with insurance proceeds the claims, demands, and/or lawsuits asserted against the Debtor, including through the mediation;
- (c) provided insurance coverage advice to the Debtor in connection with the mediation;
- (d) advised, negotiated and advocated on behalf of the Debtor with respect to its rights under Debtor’s insurance policies;
- (e) advised the Debtor’s restructuring counsel and other professionals with respect to the foregoing matters as necessary to pursue the Debtor’s efforts in maximizing insurance recoveries for the liability claims asserted against the Debtor;
- (f) provided notice of asserted claims and information regarding those claims to the Debtor’s insurers, sought defense costs from Debtor’s insurers, preserved the Debtor’s rights under its primary and excess insurance policies, and undertook other insurance recovery related steps (*e.g.*, seeking out and uncovering newly discovered insurance policies); and
- (g) provided advice to the Debtor on the insurance aspects of the Debtor’s Reorganization Plan, Disclosure Statement and related documents, including with respect to the negotiation, formulation and drafting of those documents, which ultimately led to the confirmation of the Reorganization Plan without objections from any of the Debtor’s insurers, an achievement that is not common in bankruptcy cases involving claims of child sexual abuse.

3. Given the efforts expended and the results obtained, Pillsbury respectfully submits that the compensation and expense reimbursement sought herein for the necessary and beneficial professional services Pillsbury provided to the Debtor during the Final Fee Period, including the Third Interim Fee Period, is reasonable and appropriate, commensurate with the scale, nature, and complexity of this Chapter 11 Case, and should be allowed.

4. On August 12, 2022, this Court entered the *Order Pursuant to 11 U.S.C. §§ 105(A) and 331 Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of*

Professionals [Docket No. 125] (the “Interim Compensation Order”). The Interim Compensation Order provides that when seeking compensation for services rendered, professionals must submit monthly fee statements to certain notice parties. Each person receiving a statement has fifteen (15) days after its receipt to review and object to such monthly fee statements. If no objection is made, the Debtor is authorized to pay eighty percent (80%) of the fees requested (with the remaining twenty percent (20%) of the fees requested referred to herein as the “Holdback”) and 100% of the charges and disbursements requested. Pillsbury has submitted monthly fee statements for each of the months covered by the Final Fee Period (including the Third Interim Fee Period). The aggregate Holdback amount for the Third Interim Fee Period is \$34,239.42 (the “Third Interim Holdback Amount”). Pillsbury is currently seeking allowance of its fees and expenses for the Final Fee Period, including allowance and payment of the Third Interim Period, for an aggregate amount of \$171,197.10.³

5. This Fee Application has been prepared in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the Interim Compensation Order, the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases pursuant to General Order M-447* (Jan. 29, 2013) (the “Local Guidelines”) and the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Case*, effective November 1, 2013 (the “UST Guidelines,” and, together with the Local Guidelines, the “Fee Guidelines”).

³ Pursuant to the Chapter 11 Plan Pillsbury has agreed to apply a discount to its fees incurred in the Chapter 11 Case in an amount equal to the greater of (a) 15% and (b) the current applicable discount in place pursuant to Pillsbury’s retention application approved by the Bankruptcy Court. Because this further discount was not assigned to specific timekeepers, task codes, or billing entries, the data reported in these summary charts reflects all time initially requested in prior fee applications and excludes that discount.

6. The Debtor has been given the opportunity to review this Fee Application and has approved the compensation and reimbursement of expenses requested herein.

Jurisdiction and Venue

7. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

A. The Chapter 11 Filing and General Case Background

8. On June 29, 2022 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, thereby commencing this Chapter 11 Case. The Debtor continues to manage and operate its business as debtor in possession under sections 1107 and 1108 of the Bankruptcy Code.

9. No trustee or examiner has been appointed in this chapter 11 case. On July 13, 2022, the U.S. Trustee appointed the Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code consisting of seven individual members [Docket No. 53] (each, a “Committee Member” and collectively, the “Committee Members”).

10. A description of the Debtor’s business, the reasons for commencing this Chapter 11 Case, the relief sought from the Court to allow for a smooth transition into chapter 11, and the facts and circumstances supporting this Motion are set forth in the *Declaration of Jeffrey Dold (I) in Support of First Day Motions and (II) Pursuant to Local Bankruptcy Rule 1007-2* [Docket No. 10].

11. The Debtor filed its Plan and Disclosure Statement on April 12, 2023. On April 28, 2023, the court entered the *Order (I) Conditionally Approving the Adequacy of the Disclosure*

Statement; (II) Approving Form of Notices and Ballots; (III) Establishing (A) solicitation and Voting Procedures and (B) Notice and Objection Procedures for Confirmation; (IV) Scheduling Combined Hearing on Confirmation of Plan of Reorganization and Final Approval of Disclosure Statement; and (V) Granting Related Relief [Docket No. 461]. On April 28, 2023, June 9, 2023, June 19, 2023, and July 21, 2023, the Debtor filed further revised versions of the Plan [Docket Nos. 465, 515, 525, 574]. On August 18, 2023, the Court entered an order confirming the Plan and approving the Disclosure Statement on a final basis.

12. The Debtor has advised Pillsbury that, to date, all quarterly fees due to the U.S. Trustee have been paid and all monthly operating reports have been filed through August 31, 2023.

13. On December 15, 2022, the Debtor filed the First Interim Fee Application for the period of June 29, 2022 to October 31, 2022 (The “First Interim Fee Application” and the fee period thereunder, the “First Interim Fee Period”). Certain amounts in the First Interim Fee Application were allowed by the Court in the *Omnibus Order Granting Applications for Allowance of Interim Compensation and Reimbursement of Expenses* [Docket No. 357] (the “Omnibus First Fee Application Order”). As stated in the Omnibus First Fee Application Order, Pillsbury made further reductions to its fees and expenses for the First Interim Fee Period after receiving informal comments by the U.S. Trustee.

14. On April 14, 2023, the Debtor filed the Second Interim Fee Application for the period of November 1, 2022 to February 28, 2023 (the “Second Interim Fee Application” and the fee period thereunder, the “Second Interim Fee Period”). As stated in the Omnibus Second Fee Application Order, Pillsbury made further reductions to its fees for the Second Interim Fee Period after receiving informal comments by the U.S. Trustee.

B. The Debtor's Retention of Pillsbury Winthrop Shaw Pittman LLP

15. On June 30, 2022, the Debtor filed an application to employ Pillsbury as its special insurance counsel [Docket No. 13] (the "Retention Application"). On August 12, 2022, the Court entered an order approving the Retention Application (the "Retention Order") [Docket No. 123], attached hereto as **Exhibit B** and incorporated by reference.

16. The Retention Order authorized the Debtor to compensate and reimburse Pillsbury, effective as of the Petition Date, as special insurance counsel in this Chapter 11 Case. The Retention Order also authorizes the Debtor to compensate Pillsbury at its hourly rates charged for services of this type and to reimburse Pillsbury for its actual and necessary out-of-pocket expenses incurred, subject to application to this Court. The terms of Pillsbury's engagement are detailed in the engagement letter by and between Pillsbury and the Debtor, effective as of July 24, 2019, and attached to the Retention Application as Exhibit 1 (the "Engagement Letter") and further clarified by the Supplemental Declaration of Joseph D. Jean [Docket No. 101] (the "Supplemental Declaration").

17. The Retention Order further authorized Pillsbury to provide services as described in the Retention Application, including:

- (a) analyzing, investigating, and assessing the Debtor's rights under its newly discovered liability insurance policies;
- (b) analyzing, reviewing and attempting to mediate and otherwise resolve with insurance proceeds the claims, demands, and/or lawsuits asserted against the Debtor;
- (c) advising, negotiating and advocating on behalf of the Debtor with respect to its rights under Debtor's insurance policies;
- (d) advising the Debtor's restructuring counsel and other professionals with respect to the foregoing matters as necessary to pursue the Debtor's efforts in maximizing insurance recoveries for the liability claims being asserted against Debtor;

- (e) noticing claims, keeping insurers informed, seeking defense costs from Debtor's insurers and other insurance recovery related steps (e.g., seeking out and uncovering newly discovered insurance policies) and to preserve Debtor's rights under Debtor's primary and excess insurance policies; and
- (f) litigating against any insurer that denies coverage or refuses to fully honor its coverage commitments to Debtor to fully and effectively resolve all covered or potentially covered CVA Claims against Debtor and/or any other claims that may arise against Debtor.

C. Disinterestedness of Pillsbury Winthrop Shaw Pittman LLP

18. To the best of the Debtor's knowledge and as disclosed in the Declaration of Joseph D. Jean (the "Initial Declaration") [Docket No. 13], the Supplemental Declaration, and the second supplemental declaration of Joseph D. Dean [Docket No. 247] (the "Second Supplemental Declaration" and with the Initial Declaration and Supplemental Declaration, the "Declarations"), (a) Pillsbury is a "disinterested person: within the meaning of section 101(14) of the Bankruptcy Code, as required by section 327(a) of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtor or its estate with respect to the matters for which Pillsbury is employed, and (b) Pillsbury has no connection to the Debtor, its creditors, or other parties-in-interest, except as may have been disclosed in the Declarations.

19. Pillsbury may have in the past represented, may currently represent, and may in the future represent parties-in-interest in connection with matters unrelated to the Debtor in this Chapter 11 Case. In the Declarations, Pillsbury disclosed its connections to parties-in-interest that it has been able to ascertain using its reasonable efforts. In light of the extensive number of the Debtor's creditors and other parties-in-interest, Pillsbury is unable to conclusively identify all potential relationships. To the extent that Pillsbury becomes aware of any additional relationships that may be relevant to Pillsbury's representation of the Debtor, Pillsbury will promptly file a further supplemental declaration.

20. Pillsbury performed the services for which it is seeking compensation on behalf of the Debtor and its estate, and not on behalf of any committee, creditor, or other entity.

21. Pillsbury has received no payment and no promises for payment from any source other than the Debtor for services provided or to be provided in any capacity whatsoever in connection with this Chapter 11 Case.

22. Pursuant to Bankruptcy Rule 2016(b), Pillsbury has not shared, nor has Pillsbury agreed to share, (a) any compensation it has received or may receive with another party or person other than with the partners, counsel, and associates of Pillsbury, or (b) any compensation another person or party has received or may receive.

**Summary of Professional Compensation
and Reimbursement of Expenses Requested**

23. Pillsbury seeks allowance of compensation for professional services performed during the Final Fee Period in the amount of \$1,110,635.52 and for reimbursement of expenses incurred in connection with the rendition of such services in the amount of \$9,076.84, including \$171,197.10 in fees and \$0.00 in expenses for the Third Interim Fee Period⁴. During the Final Fee Period, Pillsbury attorneys and paraprofessionals expended a total of 1,536.2 hours in connection with the necessary services performed.

24. The hourly rates set forth in the Initial Declaration are Pillsbury's standard hourly 2022 rates. These rates are set at a level designed to fairly compensate Pillsbury for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses and are revised on

⁴ As set forth in the Chapter 11 Plan, Pillsbury has agreed to apply a discount to its fees incurred in the Chapter 11 Case in an amount equal to the greater of (a) 15% and (b) the current applicable discount in place pursuant to Pillsbury's retention application approved by the Bankruptcy Court. The amounts included herein are reflective of such discount.

an annual basis. The hourly rates and corresponding rate structure utilized by Pillsbury in this Chapter 11 Case is equivalent to the hourly rates and corresponding rate structure used by Pillsbury for other bankruptcy matters, as well as non-bankruptcy matters, because, as a voluntary concession to the Debtor Pillsbury is not applying its annual rate increase which took effect on January 1, 2023.

25. Attached hereto as **Exhibit C** is a schedule of Pillsbury's attorneys and paraprofessionals who have performed services for the Debtor during the Third Interim Fee Period and Final Fee Period, the capacities in which each individual is employed by Pillsbury, the department in which the individual practices, the hourly billing rate charged by Pillsbury for services performed by such individuals, the year in which each attorney was first licensed to practice law, where applicable, and the aggregate number of hours expended in this matter and fees billed in connection therewith.

26. Attached hereto as **Exhibit D** is a summary of Pillsbury's time records during the Third Interim Fee Period and the Final Fee Period using task codes described below. To provide a meaningful summary of Pillsbury's services provided on behalf of the Debtor and its estate, Pillsbury has established, in accordance with its internal billing procedures, certain task code categories (each, a "**Task Code Category**") in connection with this Chapter 11 Case. Pillsbury maintains computerized records of time spent by all Pillsbury attorneys and paraprofessionals in connection with this Chapter 11 Case. Copies of these computerized records have been furnished to the Debtor and the Court in the format specified by the Fee Guidelines for each month of the case through the Effective Date, each with a statement of the fees and disbursements accrued during the corresponding month.

27. Attached hereto as **Exhibit E** is a schedule specifying the categories of expenses for which Pillsbury is seeking reimbursement and the total amount for each such expense category. Itemized computer records of all such expenses have been provided to the Debtor and filed in conjunction with each monthly fee statement.

28. Attached hereto as **Exhibit F** is a summary and comparison of the aggregate blended hourly rates billed by Pillsbury's timekeepers to non-bankruptcy matters during the proceeding rolling twelve-month period year ending August 31, 2023, and the blended hourly rates billed to the Debtor during the Third Interim Fee Period and Final Fee Period.

29. Attached hereto as **Exhibit G** is a detailed statement of fees incurred during the Fee Period. The services rendered by Pillsbury during the Fee Period are sorted by the Task Code Categories. The attorneys and paralegals who rendered services relating to each Task Code Category are identified, along with the number of hours for each individual, the compensation sought, and a description of the work completed.

30. With respect to budgeting, and as discussed with Teneo, Pillsbury's estimated fees for the period of March 1, 2022 through August 31, 2023 were \$55,000.00 per month, or approximately \$330,000.00.

31. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Final Fee Period, but were not processed prior to the preparation of this Fee Application, Pillsbury reserves the right to request additional compensation for such services and reimbursement of such expenses by future application to the Court.

Summary of Legal Services Rendered During the Fee Period

32. As discussed above, during the Third Interim Fee Period, Pillsbury provided significant and important professional services to the Debtor in connection with this Chapter 11

Case. These services were necessary to address a multitude of critical issues in this Chapter 11 Case.

33. Below is a more detailed summary of the most significant professional services performed by Pillsbury in each Task Code Category for those categories in which Pillsbury provided more than ten (10) hours in services, organized in accordance with Pillsbury's internal system of matter numbers for this Chapter 11 Case. The detailed descriptions demonstrate that Pillsbury's services to the Debtor were necessary to meet the needs of the Debtor's estate in this Chapter 11 Case.

A. Case Administration [Task Code Category 701]

Total Fees: \$3,960.00

Total Hours: 9.9

34. This Task Code Category includes time spent by Pillsbury attorneys providing services that were necessary to ensure the efficient and effective administration of legal services to the Debtor. Specifically, Pillsbury attorneys:

- (a) reviewed and responded to correspondence from insurance companies;
- (b) revised coverage chart to include newly identified insurance policies;
- (c) reviewed and analyzed the Debtor's insurance policies in connection with the CVA Claims; and
- (d) maintained a log of tender letters, responses, and insurance payments.

B. Asset Analysis and Recovery [Task Code Category 702]

Total Fees: \$33,543.00

Total Hours: 41.6

35. This Task Code Category includes time spent by Pillsbury attorneys in connection with the location, notification, analysis of pursuit of liability insurance coverage to respond to the CVA Claims. Specifically, Pillsbury attorneys:

- (a) located and analyzed insurance liability policies issued to the Debtor that may provide coverage for the CVA Claims;

- (b) prepared correspondence to and reviewed correspondence from Debtor's insurance carriers re: Debtor's claims for defense and indemnity for the CVA Claims;
- (c) kept Debtor's liability insurers informed of the status of settlements of underlying CVA Claims;
- (d) identified, researched, and set forth to Debtor's liability insurers Debtor's potential claims for bad faith and consequential damages against those insurers for breaches of their obligations to Debtor arising from the CVA Claims that Debtor contends contributed to its decision to commence its reorganization case in this Court;
- (e) participated in telephone and other conferences with Debtor's insurers and their counsel concerning the Debtor's claims for coverage under its liability insurance policies for the CVA Claims; and
- (f) responded to requests for information propounded by Debtor's insurers with respect to the CVA Claims, Debtor's defense of those claims, and Debtor's request for defense and indemnity with respect to those claims.

C. Claims Administration and Objections [Task Code Category 708]

Total Fees: \$22,097.60

Total Hours: 24.1

36. This Task Code Category includes time spent by Pillsbury attorneys providing services relating to the preparation of the Debtor's chapter reorganization 11 plan and disclosure statement. Specifically, Pillsbury attorneys analyzed insurance policies in connection with the policies' potential assignment to a compensation trust in connection with the Debtor's chapter 11 plan.

D. Plan and Disclosure Statement [Task Code Category 709]

Total Fees: \$93,660.60

Total Hours: 99

37. This Task Code Category includes time spent by Pillsbury attorneys providing services in connection with insurance-related aspects of the drafting and negotiation of the Debtor's Reorganization Plan, Disclosure Statement and associated documents. Specifically, Pillsbury attorneys spent time:

- (a) advising the Debtor on the treatment of its insurance policies and the Debtor's rights under the Reorganization Plan;
- (b) providing advice to Debtor concerning the insurance aspects of the negotiation and drafting of the Debtor's Reorganization Plan, Disclosure Statement and associated documents;
- (c) negotiating and advocating on behalf of Debtor in connection with the insurance aspects of the negotiation and drafting of the Debtor's Reorganization Plan, Disclosure Statement and associated documents; and
- (d) preparing and revising insurance aspects of Reorganization Plan, Disclosure Statement and associated documents.

E. Litigation [Task Code Category 710]

Total Fees: \$10,475.60

Total Hours: 10.6

38. This Task Code Category includes time spent by Pillsbury attorneys assisting the Debtor in responding to discovery requests of insurance-related communications and documents.

Actual and Necessary Expenses Incurred by Pillsbury

39. As set forth in **Exhibit E** attached hereto, Pillsbury has incurred a total of \$9,076.84⁵ in expenses on behalf of the Debtor during the Final Fee Period, including \$0 in expenses during the Third Interim Fee Period. These charges are intended to reimburse Pillsbury's direct operating costs, which are not incorporated into Pillsbury's hourly billing rates. Pillsbury charges external copying and computer research at the provider's cost without markup. Only clients who actually use services of this type are separately charged for such services. The effect of including such expenses as part of the hourly billing rates would impose that cost upon clients who do not require extensive photocopying and other facilities and services.

⁵ This amount includes the \$133.34 reduction agreed to after the United States Trustee's informal objections to the First Interim Fee Application.

40. In compliance with the Fee Guidelines, Pillsbury charges for document printing and reproduction costs at \$0.10 per page for document printing. This does not exceed the maximum rate set by the Fee Guidelines. In total, all document copying and reproduction for the Final Fee Period is \$2,178.16, there were no copy and reproduction costs in the Third Interim Fee Period.

41. In addition, due to the location of the Debtor's business, creditors, and other parties-in-interest in relation to Pillsbury's offices, frequent multi-party telephone conferences involving numerous parties were required. The disbursements for such services are not included in Pillsbury's overhead for the purpose of setting billing rates, and Pillsbury has made every effort to minimize its disbursements in this Chapter 11 Case. The actual expenses incurred in providing professional services were necessary, reasonable, and justifiable under the circumstances to serve the needs of the Debtor in this Chapter 11 Case.

42. Among other things, Pillsbury ensures that all overtime meals, travel meals, hotel rates, and airfares are reasonable and appropriate expenses for which to seek reimbursement. Specifically, Pillsbury regularly reviews its bills to ensure that the Debtor is only billed for services that were actual and necessary and, where appropriate, prorates expenses.

Pillsbury's Requested Compensation and Reimbursement Should Be Allowed

43. Section 330 of the Bankruptcy Code provides that a court may award a professional employed under section 327 of the Bankruptcy Code "reasonable compensation for actual necessary services rendered . . . and reimbursement for actual, necessary expenses." 11 U.S.C. § 330(a)(1). Section 330 also sets forth the criteria for the award of such compensation and reimbursement:

In determining the amount of reasonable compensation to be awarded . . . the court shall consider the nature, extent, and the value of such services, taking into account all relevant factors, including—

- (a) the time spent on such services;
- (b) the rates charged for such services;
- (c) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (d) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (e) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (f) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a)(3).

44. Pillsbury respectfully submits that the services for which it seeks compensation in this Fee Application were, at the time rendered, necessary for and beneficial to the Debtor and its estate and were rendered to protect and preserve the Debtor's estate. Pillsbury further believes that it performed the services for the Debtor economically, effectively, and efficiently, and the results obtained benefited not only the Debtor, but also the Debtor's estate and the Debtor's stakeholders. Pillsbury further submits that the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Debtor, its estate, and all parties-in-interest.

45. During the Final Fee Period, Pillsbury's hourly billing rates for attorneys ranged from \$1,413.00 to \$1,097.00 for partners, \$1,156.00 to \$944.00 for counsel, \$882.00 to \$604.00 for associates, \$468.00 to \$442.00 for staff attorneys, and \$540.00 to \$383.00 for Sr. Law Clerks and paraprofessionals. These hourly rates and corresponding rate structure utilized by Pillsbury

in this Chapter 11 Case is equivalent to the hourly rates and corresponding rate structure used by Pillsbury for non-bankruptcy matters, whether in court or otherwise, regardless of whether a fee application is required. Pillsbury strives to be efficient in the staffing of all matters. These rates and the rate structure reflect that such matters are typically national in scope and involve great complexity, high stakes, and severe time pressures—all of which were present in this Chapter 11 Case.

46. Moreover, Pillsbury's hourly rates are set at a level designed to compensate Pillsbury fairly for the work of its attorneys and paraprofessionals and to cover certain fixed and routine overhead expenses. Hourly rates vary with the experience and seniority of the individuals assigned. These hourly rates are subject to periodic adjustments to reflect economic and other conditions and are consistent with the rates charged elsewhere.

47. In sum, Pillsbury respectfully submits that the professional services provided by Pillsbury on behalf of the Debtor and its estate during this Chapter 11 Case, were necessary and appropriate given the complexity of this Chapter 11 Case, the time expended by Pillsbury, the nature and extent of Pillsbury's services provided, the value of Pillsbury's services, and the cost of comparable services outside of bankruptcy, all of which are relevant factors set forth in section 330 of the Bankruptcy Code. Accordingly, Pillsbury respectfully submits that approval of the compensation sought herein is warranted and should be approved.

Reservation of Rights

48. It is possible that some professional time expended or expenses incurred during the Final Fee Period are not reflected in this Fee Application. Pillsbury reserves the right to include such amounts in future fee applications.

Notice

49. The Debtor will provide notice of this Second Interim Fee Application to: (a) the United States Trustee for Region 2; (b) counsel to the Committee; (c) counsel to BGCA; (d) counsel to Rockefeller; (e) the Debtor's insurers that have accepted coverage related to the Abuse Claims; (f) the office of the Attorney General for the State of New York; (g) the United States Attorney's Office for the Southern District of New York; (h) counsel to the DIP Lender; and (i) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtor submits that, in light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

50. No prior request for the relief sought in this Motion has been made to this or any other court

[Remainder of page intentionally left blank.]

WHEREFORE, Pillsbury respectfully requests that the Court enter an order: (a) approving the interim allowance of \$171,197.10 as the total compensation for professional services rendered during the Third Interim Fee Period and \$0.00 for reimbursement of actual and necessary costs and expenses incurred by Pillsbury for the Third Interim Fee Period, (b) approving the final allowance of compensation for professional and paraprofessional services provided during the Final Fee Period in the amount of \$1,110,635.32 and reimbursement of actual, reasonable and necessary expenses incurred in the Final Fee Period in the amount of \$9,076.84; (c) authorizing and directing the Debtor to remit payment to Pillsbury its unpaid fees and expenses in the amount of \$38,374.89; and (d) granting such other relief as is appropriate under the circumstances.

New York, New York
Dated: October 5, 2023

/s/ Joseph D. Jean

Joseph D. Jean
Scott D. Greenspan
**PILLSBURY WINTHROP SHAW PITTMAN
LLP**
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New York, New York 10019
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*Special Insurance Counsel to the Debtor and
Debtor in Possession*

Exhibit A

Jean Declaration

Joseph D. Jean, Esq.
Scott D. Greenspan, Esq.
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*Special Insurance Counsel to the Debtor and
Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,¹

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**DECLARATION OF JOSEPH D. JEAN
IN SUPPORT OF THE THIRD INTERIM AND FINAL FEE APPLICATION OF
PILLSBURY WINTHROP SHAW PITTMAN LLP, SPECIAL INSURANCE COUNSEL
FOR THE DEBTOR AND DEBTOR IN POSSESSION, FOR THE PAYMENT OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM JUNE 29, 2022 THROUGH AND INCLUDING AUGUST 21, 2023**

Joseph D. Jean makes this declaration under 28 U.S.C. § 1746:

1. I am a partner in the law firm of Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”), an international law firm with its principal offices at 31 West 52nd Street, New York, NY 10019. I am a lead attorney from Pillsbury working on the above-captioned chapter 11 case (the “Chapter 11 Case”). I am a member in good standing of the Bar of the State of New York

¹ The last four digits of the Debtor’s federal tax identification number are 6792. The Debtor’s mailing address is 250 Bradhurst Avenue, New York, New York 10039.

and I have been admitted to practice in the United States District Court for the Southern District of New York.

2. I have read the foregoing fee application of Pillsbury for the Fee Period (the “Fee Application”).² To the best of my knowledge, information, and belief, the statements contained in the Fee Application are true and correct. In addition, I believe that the Fee Application complies with Local Rule 2016-1 and the Fee Guidelines.

3. In connection therewith, I hereby certify that:

- a) I have read this application;
- b) to the best of my knowledge, information, and belief, formed after reasonable inquiry, the fees and disbursements sought in the Fee Application are permissible under the relevant rules, court orders, and Bankruptcy Code provisions;
- c) the fees and disbursements sought in the Fee Application are billed at rates customarily employed by Pillsbury and generally accepted by Pillsbury’s clients; provided, that Pillsbury has discounted such rates and has not applied its annual rate increase to this matter. In addition, none of the professionals seeking compensation varied their hourly rate based on the geographic location of the Debtor’s case;
- d) in providing a reimbursable expense, Pillsbury does not make a profit on that expense, whether the service is performed by Pillsbury in-house or through a third party;
- e) in accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, no agreement or understanding exists between Pillsbury and any other person for the sharing of compensation to be received in connection with the above cases except as authorized pursuant to the Bankruptcy Code, Bankruptcy Rules, or Local Rules; and
- f) all services for which compensation is sought were professional services on behalf of the Debtor and not on behalf of any other person.

² Capitalized terms used, but not otherwise defined herein, have the meanings ascribed to them in the Fee Application.

4. Pillsbury discussed its rates, fees, and budget with the Debtor at the outset of, and throughout, the Chapter 11 Case, including by increasing its discount from standard hourly rates from 10% to 15% after the First Fee Period at the Debtor's request due to the Debtor's financial circumstances. In addition, under the Chapter 11 Plan, Pillsbury has agreed to apply a discount to its fees incurred in the Chapter 11 Case in an amount equal to the greater of (a) 15% and (b) the current applicable discount in place pursuant to Pillsbury's retention application approved by the Bankruptcy Court (the "Chapter 11 Plan Discount"). Because this further discount was not assigned to specific timekeepers, task codes, or billing entries, the data reported in these summary charts reflects all time initially requested in prior fee applications and excludes that discount.

5. Pursuant to Section B(2) of the local Guidelines, and as required by the Interim Compensation Order,³ I certify that Pillsbury has complied with the provisions requiring Pillsbury to provide the Debtor, counsel to the Committee, and the U.S. Trustee with a statement of Pillsbury's fees and expenses accrued during the previous month within the timetables set forth in the Interim Compensation Order.

6. Pursuant to Section B(3) of the Local Guidelines, I certify that Pillsbury has provided the Debtor, counsel to the Committee, and the U.S. Trustee with a statement of Pillsbury's fees and expenses incurred during the Final Fee Period.

7. In accordance with the U.S. Trustee's Guidelines, Pillsbury responds to the questions identified therein as follows:

Question 1: Did Pillsbury agree to any variations from, or alternatives to, Pillsbury's standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the Fee Period? If so, please explain.

³ See Order Pursuant to 11 U.S.C. §§ 105(A) and 331 Establishing Procedures for Monthly Compensation and Reimbursement of Expenses of Professionals [Docket No. 125].

Answer: Yes, During the Second and Third Interim Fee Period, Pillsbury agreed to provide the Debtor with a discount of 15% off its standard and customary billing rates, which is an increase from the original 10% discount Pillsbury agreed to at the outset of the case. This increase in discount was provided at the Debtor's request due to its financial circumstances. In addition, pursuant to the Chapter 11 Plan, Pillsbury has agreed to apply a discount to its fees incurred in the Chapter 11 Case in an amount equal to the greater of (a) 15% and (b) the current applicable discount in place pursuant to Pillsbury's retention application approved by the Bankruptcy Court (the "Chapter 11 Plan Discount"). Because this further discount was not assigned to specific timekeepers, task codes, or billing entries, the data reported in these summary charts reflects all time initially requested in prior fee applications and excludes that discount.

Question 2: If the fees sought in the Fee Application as compared to the fees budgeted for the time period covered by the Fee Application are higher by 10% or more, did Pillsbury discuss the reasons for the variation with the client?

Answer: No.

Question 3: Have any of the professionals included in the Fee Application varied their hourly rate based on geographic location of the bankruptcy case?

Answer: No.

Question 4: Does the Fee Application include time or fees related to reviewing or revising time records or preparing, reviewing or revising invoices? If so, please quantify by hours and fees.

Answer: No.

Question 5: Does the Fee Application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify hours and fees.

Answer: No.

Question 6: Does the Fee Application include any rate increases since Pillsbury's retention in this case? If so, did the client review and approve those rate increases in advance? Did the client agree when retaining the law firm to accept all future rate increases?

Answer: No. The Fee Application does not include any rate increases since Pillsbury's retention in this Chapter 11 Case. In fact, as stated, Pillsbury's fees were discounted further after the First Interim Fee Period at the Debtor's request due to the Debtor's financial circumstances. In addition, pursuant to the Chapter 11 Plan, Pillsbury has agreed to apply a discount to its fees incurred in the Chapter 11 Case in an amount equal to the greater of (a) 15% and (b) the current applicable discount in place pursuant to Pillsbury's retention application approved by the Bankruptcy Court (the "Chapter 11 Plan Discount"). Because this further discount was not assigned to specific timekeepers, task

codes, or billing entries, the data reported in these summary charts reflects all time initially requested in prior fee applications and excludes that discount.

[Remainder of page intentionally left blank.]

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: October 5, 2023
New York, New York

Respectfully submitted,

/s/ Joseph D. Jean

Joseph D. Jean

Partner

Pillsbury Winthrop Shaw Pittman LLP

Exhibit B

Retention Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,¹

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**ORDER PURSUANT TO 11 U.S.C. § 327(e)
AND FED. R. BANKR. P. 2014 AND 2016 AUTHORIZING
EMPLOYMENT AND RETENTION OF PILLSBURY WINTHROP SHAW PITTMAN
LLP AS SPECIAL INSURANCE COUNSEL FOR DEBTOR AND DEBTOR IN
POSSESSION *NUNC PRO TUNC* TO THE PETITION DATE**

Upon the application (the “Application”)² of the above-captioned debtor and debtor in possession (the “Debtor”) for entry of an order, pursuant to section 327(e) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rules 2014-1 and 2016-1, authorizing the Debtor to employ and retain Pillsbury Winthrop Shaw Pittman LLP (“Pillsbury”) as its special insurance counsel, effective as of the Petition Date; and upon the Jean Declaration and the Dold Declaration (together, the “Declarations”); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this proceeding being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Application in this Court being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Application having been given; and the Court having found that no other or further notice is needed or necessary; and the Court having found that the relief requested in the Application is in the best interests of the Debtor’s estate, its creditors, and other parties in interest; and this Court having reviewed the Application and having heard the

¹ The last four digits of the Debtor’s federal tax identification number are 6792. The Debtor’s mailing address is 250 Bradhurst Avenue, New York, New York 10039.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Retention Application.

statements in support of the relief requested therein at a hearing before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Application and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and any objections to the relief requested in the Application having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, it is hereby **ORDERED** that:

1. The Application is granted as set forth herein.
2. The Debtor is authorized, pursuant to section 327(e) of the Bankruptcy Code and Bankruptcy Rules 2014(a) and 2016, to retain and employ Pillsbury as special insurance counsel effective *nunc pro tunc* to the Petition Date, to provide the following services:

- (a) Analyzing, investigating, and assessing the Debtor’s rights under its newly discovered liability insurance policies;
- (b) Analyzing, reviewing and attempting to mediate and otherwise resolve with insurance proceeds the claims, demands, and/or lawsuits asserted against the Debtor;
- (c) Advising, negotiating and advocating on behalf of the Debtor with respect to its rights under Debtor’s insurance policies;
- (d) Advising the Debtor’s restructuring counsel and other professionals with respect to the foregoing matters as necessary to pursue the Debtor’s efforts in maximizing insurance recoveries for the liability claims being asserted against Debtor;
- (e) Noticing claims, keeping insurers informed, seeking defense costs from Debtor’s insurers and other insurance recovery related steps (e.g., seeking out and uncovering newly discovered insurance policies) and to preserve Debtor’s rights under Debtor’s primary and excess insurance policies; and
- (f) Litigating against any insurer that denies coverage or refuses to fully honor its coverage commitments to Debtor to fully and effectively resolve all covered or potentially covered CVA claims against Debtor and/or any other claims that may arise against Debtor.

3. Pillsbury shall be compensated in accordance with the procedures set forth in the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and any applicable orders of this Court.

4. Pillsbury shall use its best efforts to avoid any duplication of services provided by any of the Debtor's other Chapter 11 Professionals in this chapter 11 case.

5. Prior to any increases in Pillsbury's rates for any individual retained by Pillsbury and providing services in this case, Pillsbury shall file a supplemental affidavit with the Court and provide ten business days' notice to the Debtor, the United States Trustee and any official committee. The supplemental affidavit shall explain the basis for the requested rate increases in accordance with Section 330(a)(3)(F) of the Bankruptcy Code and state whether Pillsbury's client has consented to the rate increase. The United States Trustee retains all rights to object to any rate increase on all grounds including, but not limited to, the reasonableness standard provided for in section 330 of the Bankruptcy Code.

6. In the event of any inconsistency between the terms of the Application, the Jean Declaration, and this Order, the terms of this Order shall govern.

7. The Debtor and Pillsbury are authorized to take all actions necessary or appropriate to implement the relief granted in this Order.

8. Notice of the Application as provided therein shall be deemed good and sufficient notice of the Application, and the Local Rules are satisfied by the contents of the Application.

9. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.

10. This Court retains jurisdiction over all matters arising from or related to the implementation or interpretation of this Order.

Date: August 12, 2022

/s/ *Sean H. Lane*

HONORABLE SEAN H. LANE

UNITED STATES BANKRUPTCY JUDGE

Exhibit C

**Compensation by Professional
June 29, 2022 through August 21, 2023**

Compensation By Professional for the Third Interim Fee Period
March 1, 2023 through August 21, 2023

Partners and Counsel	Title	Department	Year Admitted	Hourly Billing Rate (\$)¹	Total Billed Hours	Total Compensation (\$)
Joseph D. Jean	Partner	Litigation	1998	1,335.00	7.9	10,546.50
Peter M. Gillon	Partner	Litigation	1984	1,097.00	1.3	1,426.10
Scott D. Greenspan	Sr. Counsel	Litigation	1996	944.00	153.6	144,998.40
Total Partners and Counsel:					162.8	156,971.00

Associates	Title	Department	Year Admitted	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Andrew V. Alfano	Sr. Associate	Insolvency	2017	833.00	3.1	2,582.30
Total Associates:					3.1	2,582.30

Staff Attorneys	Title	Year Admitted	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Bryan Coffey	Attorney	2012	442.00	3.9	1,723.80
Total Staff Attorneys:				3.9	1,723.80

¹ All "Hourly Billing Rate (\$)" information reflects a 15% discount from the standard hourly rates except for paralegals where they discounted by 15% and subject to a \$400.00 cap on hourly rates. Pillsbury agreed to increase its discount from 10% to 15% after the First Fee Application at the Debtor's request due to its financial circumstances.

Sr. Law Clerks, Paralegals and Non-Legal Staff	Title	Hourly Billing Rate (\$)	Total Billed Hours	Total Compensation (\$)
Stephanie Korchinski	Paralegal	400.00	24.8	9,920.00
Total Sr. Law Clerks, Paralegals and Non-Legal Staff:			24.8	9,920.00

PROFESSIONALS	BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Partners and Counsel	964.20	162.8	156,971.00
Associates	833.00	3.1	2,582.30
Staff Attorneys	442.00	3.9	1,723.80
Paralegals/Non-Legal Staff	400.00	24.8	9,920.00
Blended Attorney Rate	949.81		
Blended Rate All Timekeepers	879.74		
Total		194.6	171,197.10

**Compensation By Professional for the
Final Fee Period (June 29, 2022 through August 21, 2023)¹²**

Partners and Counsel	Title	Department	Year Admitted	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Joseph D. Jean	Partner	Litigation	1998	1,570.00	1,413.00	75.8	1,335.00	36.2	155,432.40
Peter M. Gillon	Partner	Litigation	1984	1,290.00	1,161.00	0.0	1,097.00	28.2	30,935.40
Barbara Crouch	Senior Counsel	Litigation	1990	1,225.00	1,103.00	121.1	1,041.00	0.0	133,573.30
Barry Fleishman	Senior Counsel	Litigation	1985	1,395.00	1,156.00	16.4	1,186.00	0.0	18,958.40
Scott D. Greenspan	Senior Counsel	Litigation	1996	1,110.00	999.00	277	944.00	313.9	573,440.60
Total Partners and Counsel:						490.3		378.3	911,944.10

Associates	Title	Department	Year Admitted	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Andrew V. Alfano	Sr. Associate	Insolvency	2017	980.00	882.00	8.7	833.00	7.0	13,504.40

¹ Following discussions with the U.S. Trustee, Pillsbury agreed to reduce its fees by a total of \$10,534.40 in connection with the First Interim Fee Application and the Second Interim Fee Application. These reductions were not assigned to specific timekeepers, task codes, or billing entries. The data reported in the following summary charts reflects all time initially requested in prior fee applications. For the avoidance of doubt, Pillsbury does not seek payment of the \$10,534.40 in reductions previously made.

² In addition, pursuant to the Chapter 11 Plan, Pillsbury has agreed to apply a discount to its fees incurred in the Chapter 11 Case in an amount equal to the greater of (a) 15% and (b) the current applicable discount in place pursuant to Pillsbury's retention application approved by the Bankruptcy Court (the "Chapter 11 Plan Discount"). Because this further discount was not assigned to specific timekeepers, task codes, or billing entries, the data reported in these summary charts reflects all time initially requested in prior fee applications and excludes that discount.

Associates	Title	Department	Year Admitted	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Philip He	Associate	Litigation	2018	795.00	716.00	303.3	676.00	27.3	235,617.60
Jesse N. Vazquez	Associate	Litigation	2018	730.00	657.00	34.5	621.00	4.0	25,150.50
Krysta Woodcock	Associate	Litigation	2022	710.00	639.00	48.5	604.00	7.5	332,521.50
Total Associates:						395		45.8	309,794.00

Staff Attorneys	Title	Year Admitted	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Bryan J. Coffey	Attorney	2012	520.00	468.00	29.2	442.00	7.5	16,980.60
Total Staff Attorneys:					29.2		7.5	16,980.60

Sr. Law Clerks, Paralegals and Non-Legal Staff	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Kristina Sgambati	Sr. Law Clerk	600.00	540.00	6.2	510.00	0.0	3,348.00
Patrick Blood	Sr. Law Clerk	600.00	540.00	20.6	510.00	0.0	11,124.00
April Iniguez	Paralegal	425.00	383.00	72.1	361.00	1.3	28,083.60

Sr. Law Clerks, Paralegals and Non-Legal Staff	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Hours Billed at 10% Discount	15% Discounted Hourly Rate (\$)	Hours Billed at 15% Discount	Total Compensation (\$)
Stephanie Korchinski	Paralegal	575.00 ³	380.00	4.6	400.00	45.3	35,868.00
Total Sr. Law Clerks and Paralegals:				103.5		46.6	78,423.60

PROFESSIONALS	BLENDED RATE (\$)	TOTAL BILLED HOURS	TOTAL COMPENSATION (\$)
Partners and Counsel	1,049.90	868.6	911,944.10
Associates	702.80	440.8	309,794.00
Staff Attorney	462.69	36.7	16,980.60
Sr. Law Clerks/Paralegals/Non- Legal Staff	412.54	190.1	78,423.60
Blended Attorney Rate	920.23		
Blended Rate All Timekeepers	857.40		
Total:		1,536.2	1,317,142.30

³ Paralegal rates are capped at \$400.00 per hour or the discount designated, whichever is less. Upon increasing the discount to 15% the \$400.00 paralegal cap was, inadvertently, discounted an additional 5% to \$380.00 for one monthly billing period.

Exhibit D

**Compensation by Task Code
June 29, 2022 through August 21, 2023**

**Compensation by Task Code for the
Third Interim Fee Period (March 1, 2023 through August 21, 2023)**

Task Code	Project Category	Total Hours	Total Fees (\$)
701	Case Administration	9.9	3,960.00
702	Asset Analysis and Recovery	41.6	33,543.00
705	Fee/Employment Applications	6.0	3,785.60
707	Mediation	1.7	2,113.10
708	Claims Administration and Objections	24.1	22,097.60
709	Plan and Disclosure Statement	99	93,660.60
710	Litigation	10.6	10,475.60
711	Court Hearings	1.7	1,604.80
	Total:	194.6	171,197.10

**Compensation by Project Category for the
Final Fee Period (June 29, 2022 through August 21, 2023)**

Task Code	Project Category	Total Hours	Total Fees (\$)
701	Case Administration	107.1	58,932.00
702	Asset Analysis and Recovery	725.5	598,826.70
705	Fee/Employment Applications	31.4	20,508.40
706	Fee/Employment Objections	1.7	1,217.20
707	Mediation	417.9	405,898.90
708	Claims Administration and Objections	35.7	28,825.20
709	Plan and Disclosure Statement	198.5	186,217.90
710	Litigation	11.4	11,048.40
711	Court Hearings	7.0	7,307.60
	TOTAL (excl. Chapter 11 Plan Discount & UST Reductions):¹	1,536.2	1,318,782.30

¹ Because the voluntary reductions and discounts were not assigned to a specific task code, the amounts in this chart excludes those reductions and discounts.

**Compensation by Task Code for the
Third Interim Fee Period (March 1, 2023 through August 21, 2023)**

Task Code 701 Case Administration	Title	Hourly Billing Rate (\$)	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Stephanie Korchinski	Paralegal	575.00	400.00	9.9	3,960.00
Total:				9.9	3,960.00
Task Code 702 Asset Analysis and Recovery	Title	Hourly Billing Rate (\$)	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Joseph D. Jean	Partner	1,570.00	1,335.00	0.1	133.50
Scott D. Greenspan	Sr. Counsel	1,110.00	944.00	30.9	29,169.60
Stephanie Korchinski	Paralegal	575.00	400.00	10.6	4,240.00
Total:				41.6	33,543.10
Task Code 705 Fee/Employment Applications	Title	Hourly Billing Rate (\$)	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Andrew V. Alfano	Sr. Associate	980.00	833.00	3.2	2,665.60
Stephanie Korchinski	Paralegal	575.00	400.00	2.8	1,120.00
Total:				6	3,785.60
Task Code 707 Mediation	Title	Hourly Billing Rate (\$)	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Joseph D. Jean	Partner	1,570.00	1,335.00	1.3	1,735.50
Scott D. Greenspan	Sr. Counsel	1,110.00	944.00	0.4	377.60
Total:				1.7	2,113.10
Task Code 708 Claims Administration and Objections	Title	Hourly Billing Rate (\$)	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Scott D. Greenspan	Sr. Counsel	1,110.00	944.00	22.9	21,617.60
Stephanie Korchinski	Paralegal	575.00	400.00	1.2	480.00
Total:				24.1	22,097.60
Task Code 709 Plan and Disclosure Statement	Title	Hourly Billing Rate (\$)	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Joseph D. Jean	Partner	1,570.00	1,335.00	5.3	7,075.50

Peter M. Gillon	Partner	1,290.00	1,097.00	1.3	1,426.10
Scott D. Greenspan	Sr. Counsel	1,110.00	944.00	88.3	83,355.20
Bryan J. Coffey	Attorney	520.00	442.00	3.9	1,723.80
Stephanie Korchinski	Paralegal	575.00	400.00	0.2	80.00
Total:				99	93,660.60
Task Code 710 Litigation	Title	Hourly Billing Rate (\$)	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Joseph D. Jean	Partner	1,570.00	1,335.00	1.2	1,602.00
Scott D. Greenspan	Sr. Counsel	1,110.00	944.00	9.4	8,873.60
Total:				10.6	10,475.60
Task Code 711 Court Hearings	Title	Hourly Billing Rate (\$)	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Scott D. Greenspan	Sr. Counsel	1,110.00	944.00	1.7	1,604.80
Total:				1.7	1,604.0

**Compensation by Task Code for the
Final Fee Period (June 29, 2022 through August 21, 2023)¹**

Task Code 701 Case Administration	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Hours	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Peter M. Gillon	Partner	1,290.00	n/a	0	1,097.00	1.7	1,864.90
Barbara L. Crouch	Senior Counsel	1,225.00	1,103.00	2.9	n/a	0	3,198.70
Barry Fleishman	Senior Counsel	1,395.00	1,256.00	2.4	n/a	0	3,014.40
Philip He	Associate	795.00	716.00	34.2	n/a	0	24,487.20
Krysta Woodcock	Associate	710.00	n/a	0	604.00	0.2	120.80
Bryan J. Coffey	Attorney	520.00	468.00	7.6	n/a	0	3,556.80
April Iniguez	Paralegal	425.00	383.00	32.4	n/a	0	12,409.20
Stephanie Korchinski	Paralegal	575.00	400.00	15.8	n/a	0	10,280.00
Total:						107.10	58,932.00
Task Code 702 Asset Analysis and Recovery	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Hours	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Joseph D. Jean	Partner	1,570.00	1,413.00	15.3	1,335.00	5.3	28,694.40
Barbara L. Crouch	Senior Counsel	1,225.00	1,103.00	103	n/a	0	113,609.00
Barry Fleishman	Senior Counsel	1,395.00	1,256.00	1	n/a	0	1,256.00
Scott D. Greenspan	Senior Counsel	1,110.00	999.00	132.7	944.00	102.7	229,516.10
Philip He	Associate	795.00	716.00	214.6	676.00	26.8	171,770.40

¹ In addition, pursuant to the Chapter 11 Plan, Pillsbury has agreed to apply a discount to its fees incurred in the Chapter 11 Case in an amount equal to the greater of (a) 15% and (b) the current applicable discount in place pursuant to Pillsbury's retention application approved by the Bankruptcy Court (the "Chapter 11 Plan Discount"). Because this further discount was not assigned to specific timekeepers, task codes, or billing entries, the data reported in these summary charts reflects all time initially requested in prior fee applications and excludes that discount.

Jesse N. Vazquez	Associate	730.00	657.00	1.2	n/a	0	788.40
Bryan J. Coffey	Attorney	520.00	468.00	15.5	n/a	0	7,254.00
Patrick Blood	Senior Law Clerk	600.00	540.00	20.6	n/a	0	11,124.00
Kristina Sgambati	Senior Law Clerk	600.00	540.00	6.2	n/a	0	3,348.00
April Iniguez	Paralegal	425.00	383.00	38.8	361.00	1.3	15,329.70
Stephanie Korchinski	Paralegal	575.00	400.00	30.1	n/a	0	16,280.00
Total:						725.7	598,970.00
Task Code 705 Fee/Employment Applications	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Hours	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Scott D. Greenspan	Senior Counsel	1,110.00	999.00	0	944.00	1.5	1,416.00
Andrew V. Alfano	Sr. Associate	980.00	882.00	8.7	833.00	7.1	13,587.70
Stephanie Korchinski	Paralegal	575.00	400.00	9.5	380.00	4.6	5,548.00
Total:						31.4	20,551.70
Task Code 706 Fee/Employment Objections	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Hours	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Philip He	Associate	795.00	716.00	1.7	n/a	0	1,217.20
Total:						1.7	1,217.20
Task Code 707 Mediation	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Hours	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Joseph D. Jean	Partner	1,570.00	1,413.00	60.5	1,335.00	22.5	115,524.00
Barbara L. Crouch	Senior Counsel	1,225.00	1,103.00	10.8	n/a	0	11,912.40
Barry Fleishman	Senior Counsel	1,395.00	1,256.00	13	n/a	0	16,328.00
Scott D. Greenspan	Senior Counsel	1,110.00	999.00	144.3	944.00	30.6	173,042.10
Philip He	Associate	795.00	716.00	52	676.00	0.5	37,570.00

Jesse N. Vazquez	Associate	730.00	657.00	23.5	n/a	0	15,439.50
Krysta Woodcock	Associate	710.00	639.00	48.5	n/a	0	30,991.50
Bryan J. Coffey	Attorney	520.00	468.00	6.1	n/a	0	2,854.80
April Iniguez	Paralegal	425.00	383.00	0.2	n/a	0	76.60
Stephanie Korchinski	Paralegal	575.00	400.00	5.4	n/a	0	2,160.00
Total:						417.9	405,898.90
Task Code 708 Claims Administration and Objections	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Hours	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Scott D. Greenspan	Senior Counsel	1,110.00	999.00	0	944.00	24.0	22,656.00
Krysta Woodcock	Associate	710.00	639.00	0	604.00	7.3	4,409.20
Stephanie Korchinski	Paralegal	575.00	400.00	4.4	n/a	0	1,760.00
Total:						35.7	28,825.20
Task Code 709 Plan and Disclosure Statement	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Hours	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Joseph D. Jean	Partner	1,570.00	1,413.00	0	1,335.00	7.2	9,612.00
Peter M. Gillon	Partner	1,290.00	n/a	0	1,097.00	26.5	29,070.50
Scott D. Greenspan	Senior Counsel	1,110.00	999.00	0	944.00	140.2	132,348.80
Jesse N. Vazquez	Associate	730.00	657.00	10	621.00	4.0	9,054.00
Bryan J. Coffey	Attorney	520.00	468.00	0	442.00	7.5	3,315.00
Stephanie Korchinski	Paralegal	575.00	400.00	.2	n/a	0	80.00
Total:						195.6	183,480.30
Task Code 710 Litigation	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Hours	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Joseph D. Jean	Partner	1,570.00	1,413.00	0	1,335.00	1.2	1,602.00
Scott D. Greenspan	Senior Counsel	1,110.00	999.00	0	944.00	9.4	8,873.60

Philip He	Associate		716.00	0.8	n/a	0	572.80
Total:						11.4	11,048.40
Task Code 711 Court Hearings	Title	Hourly Billing Rate (\$)	10% Discounted Hourly Rate (\$)	Total Hours	15% Discounted Hourly Rate (\$)	Total Hours	Total Compensation (\$)
Barbara L. Crouch	Senior Counsel	1,225.00	1,103.00	4.4	n/a	0	4,853.20
Scott D. Greenspan	Senior Counsel	1,110.00	999.00	0	944.00	2.6	2,454.40
Total:						7.0	7,307.60

Exhibit E

Expense Summary
June 29, 2022 through August [], 2023

**Expense Summary for the
Third Interim Fee Period (March 1, 2023 through August [], 2023)**

Expenses Category	Total Expenses (\$)
Business Expenses	
Communications	
Corporate Services	
Duplicating Expenses & Word Processing	
Information Retrieval Services	
Local Transportation Expenses	
Mail & Messengers	
Out-of-Town Travel	
Overtime Expenses	
Professional Services	
Reporting	
TOTAL	0.00

**Expense Summary for the
Final Fee Period (June 29, 2022 through August [], 2023)**

Expenses Category	Total Expenses (\$)
Business Expenses	761.45
Duplicating Expenses & Word Processing	2,178.16
Information Retrieval Services	6,207.57
United Trustee Adjustment	(133.34)
TOTAL	9,076.84¹

¹ This amount excludes \$133.34 in reductions applied by Pillsbury following discussions with the U.S. Trustee in connection with the First Interim Fee Application

Exhibit F

**Customary and Comparable Compensation Disclosures
June 29, 2022 through August 21, 2023**

**Customary And Comparable Compensation Disclosures
For The Final Fee Period (June 29, 2022 through August 21, 2023)**

Category of Timekeeper	Blended Hourly Rate (\$)	
	Billed by Attorneys in New York on a rolling year ending in August 31, 2023, excluding bankruptcy	Billed in this fee application
Partners and Counsel	1,064.81	1,049.90
Associates	747.87	702.80
Staff Attorneys	312.86	462.69
Sr. Law Clerks, Paralegals and other Non-Legal Staff	402.08	412.54
Attorneys	908.27	920.23
All timekeepers aggregated	880.86	857.40

Exhibit G

**Detailed Time Summary
June 29, 2022 through August 21, 2023**



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

July 27, 2022
Invoice No. 8488848
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through June 30, 2022

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 8,754.90	\$ 110.40	\$ 8,865.30
Total This Invoice:	\$ 8,754.90	\$ 110.40	\$ 8,865.30

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

July 27, 2022
Invoice No. 8488848
Page 2

Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through June 30, 2022

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 702 - Asset Analysis and Recovery</u>				
B. L. Croutch	06/29/22	Review email from M. Plevin (.2); Conference with PW re: M. Plevin issues (.4); emails from/to A. Kornberg re: notice to historical insurers for BK filing (.2); revise Debtor application for Pillsbury as special insurance counsel (1.1); revise J. Dold and J. Jean supporting declarations (.6); emails re: A/R status for Application papers (.2); emails from/to S. Hasan re: documents for declarations (.2); email from A. Kornberg re: board decision (.1); emails with J. Jean and M. Kosnitzky re: status and next steps (.4); review FK June invoices for CVA matters for privilege (.4); prepare email to K. Mangino at Chubb for reimbursement of FK June invoices (.2); emails with J. Jean re: engagement and retainer issues (.5).	4.50	\$4,963.50
A. Iniguez	06/29/22	Emails regarding Friedman Kaplan invoices (.1); update Friedman Kaplan invoice chart (.3); update spreadsheet of all invoices (.2); update spreadsheet of grand totals of payments from Chubb and invoices from Friedman Kaplan and percentage of same (.3).	0.90	344.70
J. D. Jean	06/29/22	Emails and confer with B. Croutch re: scope of work and retention (.3); review and revise same (.3); emails with PW re: notice of BK to D&O (.2).	0.80	1,130.40

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

July 27, 2022
Invoice No. 8488848
Page 3

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	06/30/22	Email from K. Mangino re: FK invoices and allocation percentages (.2); review documentation re: allocation percentages (.2); emails with B. Baker re: same (.4); emails re: BK filing and next steps (.6); emails with PWSP Team re: status update (.4); emails with J. Strauss and B. Baker re: Audit request (.3).	2.10	2,316.30
Subtotal Task: 702 - Asset Analysis and Recovery			8.30	\$8,754.90
Total:			8.30	\$ 8,754.90

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
702 - Asset Analysis and Recovery	8.30	8,754.90
Total	8.30	\$ 8,754.90

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
J. D. Jean	0.80	\$1,413.00	\$1,130.40
Senior Counsel			
B. L. Croutch	6.60	\$1,103.00	\$7,279.80
Paralegal			
A. Iniguez	0.90	\$383.00	\$344.70
Total	8.30		\$8,754.90

Disbursements Incurred

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
06/30/22	Task E124 - Litigation Support (hosting charge)	Summary	\$110.40

Client No: 055278
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Michael Kosnitzky

July 27, 2022
Invoice No. 8488848
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Total Disbursements: \$110.40

Disbursement Summary

<u>Type</u>	<u>Amount</u>
Litigation Support (hosting charge)	<u>110.40</u>
Total:	\$110.40

Total Due For Matter 0000002: \$8,865.30



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

July 27, 2022
Invoice No. 8488848
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

<u>Matter Number</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
0000002	\$ 8,754.90	\$ 110.40	\$ 8,865.30
Total This Invoice:	\$ 8,754.90	\$ 110.40	\$ 8,865.30

Payable in U.S. Dollars upon receipt.

Payment Options:

For payment by mail, remit to: Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to: JP Morgan Chase Bank NA, NY, NY; ABA# 021000021 (S.W.I.F.T. Code CHASUS33), for credit to Pillsbury Winthrop Shaw Pittman LLP, Account Number 301177087165.

Please include our client, matter and invoice number for proper credit.

[Additional remittance information may also be forwarded to accountsreceivable@pillsburylaw.com]



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

August 31, 2022
Invoice No. 8488135
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through July 31, 2022

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 117,135.80	\$ 4,473.03	\$ 121,608.83
Total This Invoice:	\$ 117,135.80	\$ 4,473.03	\$ 121,608.83

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
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Client No: 055278
Matter No: 0000002
Michael Kosnitzky

August 31, 2022
Invoice No. 8488135
Page 2

Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through July 31, 2022

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
B. L. Croutch	07/05/22	Prepare audit response per audit request letter (.3); emails with J. Jean and M. Kosnitzky with proposed response (.4); emails with B. Baker and J. Strauss re: status update (.4); email from J. Glasser of Lester Schwab law firm re: Public Service Insurance (.2); emails with A. Iniguez re: same (.4); review file re: Public Service Insurance (.6); review BK Court Orders and upcoming hearings (.2).	2.50	\$2,757.50
A. Iniguez	07/05/22	Email regarding prior correspondence to Jonathan Glasser for Public Service Ins. Co. (.1); review emails and NetDocs regarding same (.2).	0.30	114.90
B. L. Croutch	07/06/22	Emails from/to J. Strauss re: insurance correspondences.	0.40	441.20
A. Iniguez	07/07/22	Review letter from Kimberly Taylor, A.G. Risk Management Inc in response to January 28, 2022 Proof of Claim Submission (.1); update chart regarding same (.1).	0.20	76.60
A. Iniguez	07/08/22	Review letter from Kimberly Taylor, A.G. Risk Management Inc. re: January 28, 2022 Proof of Claim Submission; update chart regarding same.	0.20	76.60
Subtotal Task: 701 - Case Administration			3.60	\$3,466.80

Task: 702 - Asset Analysis and Recovery

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

August 31, 2022
Invoice No. 8488135
Page 3

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	07/11/22	Review Rockefeller's opposition filing re: mediation (.2); review US Trustee's opposition papers to mediation at this time (.2); review Cravath's responses and objections to J. Marsh's insurance subpoena (.3); review Federal's responses to insurance subpoena and motion to quash and supporting papers (.5); emails with B. Baker and J. Strauss re: same (.4).	1.60	\$1,764.80
J. D. Jean	07/11/22	Conference with B. Croutch re: coverage issues re: Chubb and defense costs.	0.60	847.80
B. L. Croutch	07/12/22	Emails with B. Baker and J. Strauss re: status (.3); review letter from K. Mangino re: additional Chubb policies (.2); emails with J. Jean re: same (.2); cursory review newly found Chubb policies received from Chubb (.9); emails with M. Pierro re: same (.4); conference with M. Pierro re: Chubb policies (.4); emails to J. Strauss re: recent insurance correspondences (.2); review PW's reply to Oppositions to Mediation (.2); review letter from Allianz Resolution Management re: coverage position (.2); email and follow up calls with M. Pierro re: Security Mutual and underlying policies (.6).	3.60	3,970.80
A. Iniguez	07/12/22	Review correspondence from Chubb regarding their investigation of claims and enclosing 6 insurance policies issued by INA (.3); update correspondence chart with letter and all 6 insurance policies (.6); upload policies to shared drive and NetDocs (.2); review letter from Allianz Resolution for Jefferson Insurance acknowledging receipt of 6/6/22 correspondence (.1); update chart regarding same (.1).	1.30	497.90
B. L. Croutch	07/13/22	Attend motion for mediation (.9); review notice of appointment of creditors (.2); emails with B. Baker re: same (.3).	1.40	1,544.20
J. D. Jean	07/13/22	Review coverage correspondence from Chubb and confer with B. Croutch re: implications of same.	0.40	565.20

Client No: 055278
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Michael Kosnitzky

August 31, 2022
Invoice No. 8488135
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	07/14/22	Email from A. Kornberg re: upcoming Madison Board meeting and Pillsbury presentation (.2); emails with J. Jean re: same (.4); prepare Pillsbury insurance presentation re: Chubb/Federal policies and new policies produced (4.0); emails with J. Jean re: Chubb's motion to quash subpoena (.4).	5.00	5,515.00
B. L. Croutch	07/15/22	Work on insurance presentation (2.0); review US Trustee's Opposition Motion/Objections to Motion to Temporarily Suspend (.2).	2.20	2,426.60
B. L. Croutch	07/18/22	Prepare for upcoming Board meeting (1.1); prepare detailed chart of new Policies and information (4.1); multiple emails with J. Jean re: same (.6); review CVA plaintiffs for possible addition to Chubb and other insurance re-tenders given new policy information (.6); emails with M. Pierro re: insurance issues (.4); attend Board meeting (1.6).	8.40	9,265.20
A. Iniguez	07/18/22	Emails regarding what complaints or Plaintiffs alleged abuse was during 1968-1976 time (.2); reviewed Friedman Kaplan chart regarding same (.3); emails regarding chart of invoices from Friedman Kaplan for CVA matter (.2); updated chart of all Friedman Kaplan invoices for CVA, Alan Gray reports and Chubb payments 2019-2022 (2.8).	4.20	1,608.60
J. D. Jean	07/18/22	Review materials re: board meeting; review correspondence with Chubb re: newly located policies; confer with B. Croutch re: demands on primary insurers identified in Chubb policies and demand for defense/indemnity against Chubb under newly located policies; prepare for board meeting; attend board meeting; confer with B. Croutch re: Chubb and National Union and defense costs.	3.90	5,510.70

Client No: 055278
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Michael Kosnitzky

August 31, 2022
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	07/19/22	Review information from M. Pierro (.6); conference with FK and PW firms re: status (.6); work on new insurance policies' issues and revise charts (.8); email to K. Mangino re: additional Federal policy numbers identified to produce the policies (.2); work on issues regarding possible new re-tenders to Chubb (.7); work on issues re: possible new FK invoices from CVA matter to submit to Chubb in light of new policies/time periods (.8); emails with B. Baker re: same (.4).	4.10	4,522.30
A. Iniguez	07/19/22	Update chart of complains with abuse allegations between 1968-1976 (.4); email same to attorney for review (.2).	0.60	229.80
B. L. Croutch	07/21/22	Work on new insurance issues and cases to re-tender (4.3); review letter from Allianz re: Jefferson Insurance "newly" discovered policies and defense (.2); emails to client re: same (.2); emails to PW and FK re: same (.2); emails with J. Jean re: next steps (.4).	5.30	5,845.90
A. Iniguez	07/21/22	Update correspondence chart with Jefferson insurance agreeing to defense costs for M.H. v.. Rockefeller University; Hector Bush, et al. v. Madison Square Boys & Girls Club, Inc. Case No. 950580 (Bush #2)- 15 Plaintiffs; Samuel Castrillo v. Madison, G.F. v. The Madison Square Boys and Girls Club and Hector Bush, et al. v. Madison - Case No. 951272 (Bush #3) - Robert Ramirez. (.3).	0.60	229.80
J. D. Jean	07/21/22	Review and respond to emails re defense costs; review coverage correspondence.	0.80	1,130.40

Client No: 055278
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Michael Kosnitzky

August 31, 2022
Invoice No. 8488135
Page 6

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	07/22/22	Review letter from National Union/American Home to Mediator and emails re: same (.6); work on insurance charts (.7); email from K. Mangino re: insurance policies and information Chubb wants (.2); draft email to K. Mangino re: re-tenders of 20 plaintiffs/cases (.3); emails with J. Jean re: same (.2); emails with B. Baker re: '85-'86 Plaintiffs, '68-'70 plaintiffs, and '71-'76 Plaintiffs (.6); work on charts for each plaintiff and complaint re: same (4.3); emails from M. Pierro re: insurance issues (.4); follow up conference with M. Pierro re: same (.6).	7.70	8,493.10
A. Iniguez	07/22/22	Reviewed correspondence from Robert W. DiUbaldo representing National Union and American Home to Hon. Shelley C. Chapman regarding the 6 insurance policies recently provided by Chubb; (.2) update chart regarding same (.1); emails regarding Security Mutual and Puritan Insurance memos for tender letters to same (.2).	2.80	1,072.40
J. D. Jean	07/22/22	Confer with B. Croutch re: defense costs and coverage under Chubb and excess policies; review emails and correspondence.	0.80	1,130.40
B. L. Croutch	07/25/22	Emails with A. Kornberg and J. Jean re: National Union and Mediation (.4); Review complaints and prepare lengthy tender letters to Security Mutual for 38 additional plaintiffs and cases (9.2); multiple emails with A. Iniguez re: plaintiffs (.6); multiple emails with B. Baker re: same (.6); revise draft letter to Chubb re: re-tenders of certain plaintiffs (.2); review IAG's proposed revised charts (.4).	11.40	12,574.20

Client No: 055278
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Michael Kosnitzky

August 31, 2022
Invoice No. 8488135
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
A. Iniguez	07/25/22	Emails regarding complaints for tender letters to send to Puritan and Security Mutual (.2); review charts from Friedman Kaplan for abuse dates (.4); organize copies of complaints in shared drive folder for tender letters (.4); prepare charts of complaints for each insurer (.6); review and chart all complaints listed in draft of lender letter to Security Mutual (.7); chart same (.3); review complaints for additional complaints within 1980-1981 for Puritan tender letter (.7); update chart regarding same (.3).	3.60	1,378.80
B. L. Croutch	07/26/22	Conference with B. Baker and J. Strauss re: status (.8); review IAG's updated charts; conference with IAG and J. Strauss (.9); review complaints and work on tender letter to Puritan of 13 complaints and multiple plaintiffs (6.6); emails with B. Baker re: plaintiffs and alleged abuse dates, etc. (.6); prepare draft response to client re: new tenders and complaints/plaintiffs we anticipate with tender acceptances (.6).	9.50	10,478.50
A. Iniguez	07/26/22	Emails regarding information on Security Mutual and Arrowpoint Capital addresses and contacts for new tender letters (.2); review and update chart with information on same (.7); review complaints for descriptions on first draft of tender letter to Puritan (1.2); revise draft tender letter to Puritan with corrected paragraph references to complaints and additional complaints (2.3); emails regarding draft of tender letter to Security Mutual (.2); review complaints and amended complaints of listed 33 cases (1.9); revise Security Mutual draft tender letter with correct paragraph references and amended complaints (.9).	8.30	3,178.90

Client No: 055278
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Michael Kosnitzky

August 31, 2022
Invoice No. 8488135
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	07/27/22	Work on tenders for Security Mutual insurance (3.2); work on tenders for Puritan Insurance (1.1); multiple emails with A. Iniguez re: information needed for relevant dates, specific plaintiffs and tenders (.9); research re: Security Mutual and successors-in-interest (.6); emails with J. Strauss and M. Pierro re: revised insurance charts (.3); conference with M. Pierro re: same (.4); multiple emails to/from B. Baker re: plaintiffs for new tenders and time periods of alleged abuses (.6); revise response to T. McChristian re: new insurance and tender issues (.2).	7.10	7,831.30
A. Iniguez	07/27/22	Review draft letter to Security Mutual insurers and revise last paragraph acknowledging receipt of listed complaints (.6); review latest draft updated by attorney and add highlighted changes from draft to attorney's copy (.8); review email and attachments from Friedman Kaplan regarding complaints to send to Security Mutual and Puritan (.2); review and compare charts with draft tender letters (.4); send information regarding same difference to attorney (.3); review draft of inserts to letters of additional complaints to add to tender letters (.3); update Safety Mutual tender letter with additional 5 complaints (.9); update Puritan tender letter with additional complaint (.6); review revised draft of insurance address and contact information chart (.2); emails regarding final drafts of tender letters (.3); emails regarding final tenders, enclosures and addressees (.4); prepare link of folders of complaints for Security Mutual letter for copy center to print (.3); prepare link of complaints of complaints for Puritan letter for copy center to print (.2).	5.90	2,259.70
J. D. Jean	07/27/22	Review strategy re: coverage and defense costs; analysis re: Chubb policies; analysis re: other insurers' responsibilities; confer with B. Croutch re: same.	1.70	2,402.10

Client No: 055278
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Michael Kosnitzky

August 31, 2022
Invoice No. 8488135
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	07/28/22	Multiple emails with J. Strauss and M. Pierro re: insurance issues for the Mediation Statement (0.4); work on finalizing tender letters to Puritan Insurance (.9); work on finalizing tender letters to Security Mutual (1.1); finalize and send letter to K. Mangino re: renewal of earlier tenders in light of Federal policies now produced (.4); review latest draft mediation statement and provide comments/information (.4); review calculations re: insurance coverages (.5); review IAG comments to latest draft Mediation Statement (.2); multiple emails re: same (.4); multiple emails to J. Strauss re: fees/costs issues for Mediation Statement (.4).	4.60	5,073.80
A. Iniguez	07/28/22	Update correspondence chart with information on tender letter to Puritan of 14 complaints (.2); update chart with tender letter to Chubb of 20 complaints (.2); update chart with tender letters to Arrowpoint, Empire, Security the Bund International in China, Sirius Group, and Sam Ravit re tender of 38 complaints. (.4).	0.90	344.70
J. D. Jean	07/28/22	Review analysis and coverage correspondence; emails with PW re: same.	0.80	1,130.40
B. L. Croutch	07/29/22	Email from J. Dold re: D&O issues (.2); prepare "recent Developments" notice draft for client (.3); emails with P. Gillon and J. Vazquez re: same (.4); emails with M. Pierro re: Security Mutual successors-in-interest (.4); emails from/to L. Varga re: fees/costs and reimbursement from Chubb for Mediation Statement (.4); emails with J. Jean re: status (.4); review latest draft Mediation Statement (.3); email from A. Schwartz (US Trustee) re: Pillsbury retention and application (.2); review comments from US Trustee to Pillsbury's Application to US Bankruptcy Court to employ Pillsbury as special insurance counsel (.3); multiple emails with J. Jean re: same (.4).	3.30	3,639.90

Client No: 055278
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August 31, 2022
Invoice No. 8488135
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	07/29/22	Confer re: Chubb and excess policies; confer re: mediation statement and positions re: same and coverage.	1.20	1,695.60
J. N. Vazquez	07/29/22	Review and edit draft of email to be sent to carriers re bankruptcy.	0.60	394.20
J. N. Vazquez	07/29/22	Review Argo policy to determine if there are additional notice requirements for filing of bankruptcy.	0.40	262.80
Subtotal Task: 702 - Asset Analysis and Recovery			114.60	\$108,815.80

Task: 711 - Court Hearings

B. L. Croutch	07/01/22	Attend 1st Day Hearing before Judge S. Lane in U.S. Bankruptcy Court (2.0); prepare status update memorandum re: same (.6).	2.60	\$2,867.80
B. L. Croutch	07/20/22	Attend BK hearing (1.4); emails with B. Baker re: plaintiffs and alleged time periods to work on new tender letters (.4).	1.80	1,985.40
Subtotal Task: 711 - Court Hearings			4.40	\$4,853.20

Total: 122.60 \$ 117,135.80

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	3.60	3,466.80
702 - Asset Analysis and Recovery	114.60	108,815.80
711 - Court Hearings	4.40	4,853.20
Total	122.60	\$ 117,135.80

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

August 31, 2022
Invoice No. 8488135
Page 11

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
J. D. Jean	10.20	\$1,413.00	\$14,412.60
Senior Counsel			
B. L. Croutch	82.50	\$1,103.00	\$90,997.50
Associate			
J. N. Vazquez	1.00	\$657.00	\$657.00
Paralegal			
A. Iniguez	28.90	\$383.00	\$11,068.70
Total	122.60		\$117,135.80

Disbursements Incurred

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
06/28/22	Computer Research	Summary	\$2,281.65
07/31/22	Litigation Support (hosting charge)	Summary	111.40
07/28/22	Reproductions	Summary	2,060.55
06/30/22	Court Services	Vendor: CourtAlert.Com, Inc. Invoice#: 182970-2206 Date: 6/30/2022 - CourtAlert June 2022, S. Mercadante	19.43
Total Disbursements:			\$4,473.03

Disbursement Summary

<u>Type</u>	<u>Amount</u>
Computer Research	2,281.65
Court Services	19.43
Litigation Support (hosting charge)	111.40
Reproductions	2,060.55
Total:	\$4,473.03

Total Due For Matter 0000002: \$121,608.83



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

August 31, 2022
Invoice No. 8488135
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

<u>Matter Number</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
0000002	\$ 117,135.80	\$ 4,473.03	\$ 121,608.83
Total This Invoice:	\$ 117,135.80	\$ 4,473.03	\$ 121,608.83

Payable in U.S. Dollars upon receipt.

Payment Options:

For payment by mail, remit to: Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to: JP Morgan Chase Bank NA, NY, NY; ABA# 021000021 (S.W.I.F.T. Code CHASUS33), for credit to Pillsbury Winthrop Shaw Pittman LLP, Account Number 301177087165.

Please include our client, matter and invoice number for proper credit.

[Additional remittance information may also be forwarded to accountsreceivable@pillsburylaw.com]



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

September 19, 2022
Invoice No. 8492222
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through August 31, 2022

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 116,662.70	\$ 330.23	\$ 116,992.93
Total This Invoice:	\$ 116,662.70	\$ 330.23	\$ 116,992.93

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

September 19, 2022
Invoice No. 8492222
Page 2

Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through August 31, 2022

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 702 - Asset Analysis and Recovery</u>				
B. L. Croutch	08/01/22	Emails with B. Baker re: years of alleged abuse issues (.4); multiple emails from/to M. Levi re: insurance issues for mediation statement (.6); multiple emails with M. Pierro re: same (.6); emails with J. Jean re: US Trustee's comments re: Pillsbury retention (.4); draft supplemental declaration to file for Pillsbury retention (.9); email from M. Levi re: additional conflicts to check (.1); review firm conflicts check results and provide comments to M. Levi (.3).	3.30	\$3,639.90
A. Iniguez	08/02/22	Review correspondence from D. Walters, Security Mutual Insurance Co. in response to 7/28/22 tender letter (.1); update chart re: same (.1).	0.20	76.60
B. L. Croutch	08/03/22	Review updated insurance graph chart (.6); review further responses from M. Pierro (.3); further respond to M. Levi (.3); conference IAG and M. Levi (.4); review J. Jean comments to draft supplemental declaration (.3); revise declaration re: same (.4); email from M. Levi re: additional insurance questions (.2); emails responses re: same (.2).	2.70	2,978.10
A. Iniguez	08/03/22	Review email from New York Liquidation Bureau Receiver Operations in response to 7.28.22 tender letter re 38 complaints (.1); update chart re: same (.1).	0.20	76.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	08/04/22	Review revised draft supplemental J. Jean declaration and proposed order from PW firm re: appointment of Pillsbury as insurance coverage counsel (.2); emails with J. Jean re: same (.3); emails with M. Levi re: same (.3); email to A. Schwartz (US Trustee) re: supplemental declaration, proposed order and next steps (.2); multiple emails from I. Nasatir re: evidence of new coverage discovered and questions with him re: same (.4); emails with M. Levi and M. Pierro re: same (.3); confer with J. Jean re: preparation of policy/coverage chart and inclusion of policy information (.3).	2.00	2,206.00
J. D. Jean	08/04/22	Confer with B. Croutch re: policy chart and inclusion of policy information.	0.30	423.90
J. D. Jean	08/04/22	Emails with B. Croutch and PW re: request for insurance information from plaintiffs' ad hoc counsel (.4); confer re: same (.3).	0.70	989.10
B. L. Croutch	08/05/22	Conference with PW and IAG regarding upcoming meeting with I. Nasatir regarding insurance.	0.60	661.80
B. L. Croutch	08/08/22	Emails from M. Levi re: additional parties for conflicts purposes (.2); call from S. Ravit re: Security Mutual tender letter (.2); emails with IAG re: same (.3); emails with A. Iniguez re: wrong Sirius company served and to correct (.3); emails re: billing rates and US Trustee's office (.2); revise supplemental J. Jean declaration and proposed order for Pillsbury retention application (.4); confer with J. Jean re: insurance coverage issues and call with plaintiffs' Ad Hoc Committee (.4).	2.00	2,206.00
A. Iniguez	08/08/22	Emails from attorney forwarding voice mail from CEO of Sirius Group served tender letter (.2); review same (.1); research regarding Sirius v. Sirius International Insurance Group (.6); research on internet New York Secretary of State for correct company (.8); emails re: correct address for Sirius (.1).	1.80	689.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	08/08/22	Confer with B. Croutch re: insurance coverage issues and call with plaintiffs' ad hoc committee member (.4); conference re: recovery and pursuit of any outstanding fees and indemnity payments (.4).	0.80	1,130.40
B. L. Croutch	08/09/22	Review conflicts reports for schedule for supplemental declaration re: PWSP retention (.6); conference with I. Nasatir (Pachulski Stang Ziehl & Jones law firm) re: insurance information and questions they have (.6); follow up emails with PW firm re: same (.4).	1.60	1,764.80
A. Iniguez	08/09/22	Review envelopes of tender letters to Empire and Puritan Insurance sent on 7.28.2022 (.2); update chart of correspondence regarding same (.1).	0.30	114.90
B. L. Croutch	08/10/22	Conference with M. Pierro (IAG) and M. Levi re: insurance issues requested by I. Nasatir (.6); review and analyze requested information and prepare coverage charts (2.1); emails from M. Pierro re: same (.3); follow up conference call with IAG re: same (.4).	3.40	3,750.20
B. L. Croutch	08/11/22	Attend bankruptcy hearing for retention motions, etc. (1.6); emails with J. Jean re: National Union and AIG (.3); prepare response to email from National Union and AIG's counsel re: mediation and insurance coverage issues (.3); emails from and prepare emails to N. Valenza-Frost re: AIG and National Union (.4).	2.60	2,867.80
J. D. Jean	08/12/22	Confer with B. Croutch re: memo re: status and strategy.	0.40	565.20
J. D. Jean	08/15/22	Review correspondence re: insurance coverage and requests from ad hoc committee.	0.40	565.20
J. D. Jean	08/15/22	Confer with B. Croutch re: insurance coverage and requests from ad hoc committee.	0.20	282.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	08/16/22	Prepare for and attend conference with IAG and PW Firm re: insurance issues and charts requested by I. Nasatir (Pachulski law firm) (.8); emails from JH Strauss re: D&O insurance and provide responses re: same (.4); emails from JH Strauss re: insurance and next steps (.3); call from IAG re: plaintiffs and dates of alleged injuries (.3); prepare detailed information for IAG re: plaintiffs and dates of alleged injuries (.8).	2.60	2,867.80
B. L. Croutch	08/17/22	Emails with IAG re: insurance issues.	0.40	441.20
S. D. Greenspan	08/17/22	Correspondence with J. Jean re: assuming the matter and coverage strategy for the matter.	0.20	199.80
S. D. Greenspan	08/18/22	Correspondence with W. Clareman, J. Jean and B. Crouch re: moving forward with coverage strategy and preparing for mediation.	0.30	299.70
J. D. Jean	08/19/22	Review emails with J. Stand re: policy search and slotting chart (.2); review coverage issues re: primary secondary coverage evidence (.6).	0.80	1,130.40
J. D. Jean	08/19/22	Confer with S. Greenspan re: coverage information and missing policies.	0.40	565.20
B. J. Coffey	08/24/22	Review policy evidence and create coverage chart of policies implicated by abuse claims (.6); conferences with S. Greenspan re: same (.2).	0.80	374.40
S. Korchinski	08/24/22	Review policies and compare to chart in preparation of revising coverage chart (2.6); review additional materials for policies not previously included in review/comparison (.7); review and organize additional policies for inclusion on coverage chart (.4); review documentation for summary of claimants by year over time (.4).	4.10	1,640.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. J. Coffey	08/25/22	Conference with M. Pierro at IAG and S. Greenspan re: insurance archeology efforts and follow up requests to insurers (.4); research corporate history of insurance companies called Security Mutual to determine identity of potential successors (1.4); Review policy evidence and create coverage chart of policies implicated by abuse claims (2.8).	4.60	2,152.80
S. Korchinski	08/25/22	Review and organize evidence of insurance materials (3.6); conference with J. Jean re: coverage issues, plaintiffs and damages (.3); review document collection for policies at issue in 2019 litigation and orders re: summary judgment and appeal of same (.3).	4.20	1,680.00
B. J. Coffey	08/26/22	Review policy evidence and create coverage chart of policies implicated by abuse claims (4.6); correspondence with S. Greenspan re: same (.2).	4.80	2,246.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/26/22	Review and analyze revised draft coverage chart of GL policies and correspondence with B. Coffey re: same and re: further revisions to same (.4); review research memo and cited caselaw re: sexual abuse exclusion under New York law and correspondence with K. Sgambati re: same (.9); review and analyze insurance presentation in connection with preparation of insurance program analysis for the mediator (.3); correspondence with PW team re: aggregate limit issue on the policies and review IAG analysis re: same (.3); review correspondence/documentation re: secondary evidence of GL insurance policies in connection with preparation of insurance program analysis for the mediator (.4); review IAG proposed revisions to the draft mediation statement re: insurance program and insurance issues (.4); review and analyze letters from Chubb (INA/Federal), Allianz (Jefferson), and Carlton Fields (attorneys for AIG), transmitting the new policy documents/information obtained from these carriers in July, 2022 (.4).	3.10	3,096.90
S. Korchinski	08/26/22	Conference with K. Sgambati re: sexual misconduct endorsement review (.2); assemble documents for policy/insurance evidence binder (1.2); draft index to same (.7).	2.10	840.00
K. Sgambati	08/26/22	Review policy exclusions in current and previous litigation.	0.60	324.00
K. Sgambati	08/26/22	Research into applicability of sexual misconduct policy exclusions (5.2); conference with S. Korchinski re: same (.1); correspondence with S. Greenspan re: same (.3).	5.60	3,024.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. J. Coffey	08/29/22	Review summary of insurance coverage evidence revised by PW and IAG to compare against Pillsbury coverage chart and draft summary of differences between IAG and Pillsbury charts (.9); conferences with M. Pierro at IAG re: analysis of secondary evidence of coverage (.6); review reinsurance information for evidence of coverage and appropriateness for sharing with insurer (.4); make revisions to coverage chart (.7).	2.60	1,216.80
S. Korchinski	08/30/22	Review correspondence for insurer acceptance of coverage post filing of petition (.6); review document collection for research memo (.6).	1.20	480.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/31/22	Conference with PW team and B. Coffey re: revisions to draft mediation statement regarding the insurance program and insurance issues (.7); conference with B. Coffey re: same (.2); correspondence with J. Jean re: revisions to the draft mediation statement in light of PW team's suggested revisions (.4); correspondence/conference with B. Coffey re: preparing analysis valuing the insurance program (.4); correspondence with J. Jean re: same (.2); correspondence with M. Pierro re: revised coverage chart and review IAG revise coverage chart (.3); correspondence with PW team re: amount of Friedman Kaplan defense costs in toto and that were unpaid by the carriers in connection with preparation of mediation statement and review responses (.4); correspondence with PW team and J. Jean re: sending coverage chart to policyholder's counsel (.4); correspondence with J. Jean re: insurers' anticipated position on the BI aggregate limit issue (.2); correspondence/conferences with B. Coffey re: allocation of demands across the policies in connection with preparation of mediation statements (.3); review and revise proposed allocation of demands across the policies in connection with preparation of mediation statements (.4); revise draft mediation statement re: insurance program and insurance issues (2.4); correspondence with PW team and with J. Jean re: same (.4); correspondence with PW team and J. Jean re: providing coverage chart to plaintiffs' counsel (.3); conference with P. Blood re: research assignment on trigger of coverage issue (.3).	7.30	7,292.70
Subtotal Task: 702 - Asset Analysis and Recovery			69.20	\$54,860.60

Task: 705 - Fee/Employment Applications

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. Korchinski	08/28/22	Draft fee application for the period June 29 through July 31, 2022.	1.00	\$400.00

Subtotal Task: 705 - Fee/Employment Applications	1.00	\$400.00
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Task: 707 - Mediation

J. D. Jean	08/01/22	Review and respond to emails re: coverage issues and mediation statement.	0.20	\$282.60
J. D. Jean	08/01/22	Confer with B. Croutch re: mediation statement.	0.20	282.60
B. L. Croutch	08/02/22	Emails with J. Jean re: thoughts on responding to US Trustee re: Pillsbury retention issues (.4); research issues with prior engagements with client and billing rates for supplemental declaration (.8); email from B. Baker re: CVA cases (.2); review update on Prokopiak action (.1); Conference with M. Levi re: US Trustee's comments and provide responses (.6); multiple emails with PW Firm re: billing rates issues for pre-petition v. post-petition (.6); letter from D. Walters, Claims Director of Security Mutual re: no tender acceptance (.2); prepare supplemental declaration of J. Jean (.9); email from M. Levi re: detailed information needed for mediation statement (.2); emails with M. Pierro re: same (.4); conference with M. Pierro re: same (.4); prepare detailed responses to M. Levi (.7); emails to J. Strauss re: recent insurance correspondences for plaintiffs' ad hoc committee (.2).	5.70	6,287.10
J. D. Jean	08/02/22	Review and respond to emails re: engagement and coverage issues.	0.60	847.80
J. D. Jean	08/03/22	Review and revise engagement declaration (.4); review and respond to emails re: coverage and mediation (4).	0.80	1,130.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. L. Croutch	08/12/22	Review emails from and prepare emails to A. Kornberg re: conference with mediator (.2); prepare and revise detailed case report and status update for J. Jean (1.6); confer with J. Jean re: memo with respect to status and strategy (.4).	2.20	2,426.60
B. L. Croutch	08/15/22	Prepare for and attend conference with mediator and PW team (1.0); review latest documents from IAG for information requested by I. Nasatir (Pachulski law firm) (.5); emails and follow up conference with M. Pierro re: same (.4).	1.90	2,095.70
A. Iniguez	08/15/22	Emails re: returned envelopes of 7.28.22 tender letter (.1); update chart re: same (.1).	0.20	76.60
B. L. Croutch	08/18/22	Emails from/to J. Strauss re: mediation and PW Team starting mediator's request to then send for J. Jean's review and comments per PW (.6); emails with IAG re: TB plaintiff and date of alleged injuries (.4).	1.00	1,103.00
J. D. Jean	08/18/22	Confer with B. Croutch re: insurance request from mediator and PW's emails re: same.	0.90	1,271.70
S. D. Greenspan	08/19/22	Review and analyze memo summarizing the status of this matter including the search for additional policies and second evidence, tenders to newly identified carriers and others issues in connection with preparation of coverage strategy (.3); prepare correspondence to and review correspondence from J. Jean and B. Croutch re: coverage strategy, insurance policy search and preparation for mediation (.4); review and analyze letter from Philadelphia to the Committee of Unsecured Creditors responding to the Committee's document demand (.3); review and analyze draft coverage chart and slotting chart in connection with development of analysis of the value of the policies for mediation (.6).	1.60	1,598.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/19/22	Correspondence with W. Clareman re: preparation for the insurance aspects of mediation.	0.20	199.80
S. D. Greenspan	08/23/22	Correspondence with J. Jean and S. Korchinski re: preparation of mediation statement (.3); prepare for (review of files) and conference with S. Korchinski re: preparation of coverage chart and re: policy analysis for the mediation (.8); review and analyze PW draft of mediation statement, PW Insurance Generations and textual coverage chart in connection with preparation of statement for mediator re: Madison Square's insurance program (.9); review and analyze latest version of coverage chart and memorandum analyzing Madison's Chubb/Federal policies in connection with coverage analysis (.6); review correspondence re: preparation of slotting chart in connection with preparation of insurers' exposure analysis for the mediator (.4); review and analyze letter from Jefferson Insurance Co. of New York agreeing to defend (.3); conference with J. Jean re: mediation issues (.3).	3.70	3,696.30
J. D. Jean	08/23/22	Conference with S. Greenspan re: mediation issues (.3); emails re: J. Chapman request re: insurance materials (.3).	0.60	847.80
J. D. Jean	08/23/22	Review materials re: J. Chapman request.	0.30	423.90
S. Korchinski	08/23/22	Review and analyze email re: request for coverage chart (.8); review draft statement of insurance coverage for mediator in connection with drafting of same (.2); review and organize policies and secondary evidence while drafting list of same to be used as basis for coverage chart for mediator (2.6); conference with S. Greenspan re: specifics of policy collection/review and update of coverage chart (.4); review files for Allianz letter questioning aggregates and policies referenced in same for use in preparation of response (.6).	4.60	1,840.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/24/22	Conference with PW team re: mediation strategy and insurance issues in connection with same (.5); review and revise draft GL coverage chart and correspondence and conferences with B. Coffey and S. Korchinski re: same (.7); review and analyze summary of policies produced by Chubb in connection with preparation of insurance program analysis for the mediator (.3); review and analyze letter from Chubb re: discovery of INA umbrella policies and request for information re: policy search (.2); review and analyze memorandum re: summary of Chubb policy history (in connection with preparation of mediation statement) (.3); review and analyze memorandum re: list of insurance policies by parent corporation in connection with preparation of mediation statement (.2); review draft IAG-prepared coverage chart and chart of perpetrators in connection with preparation of insurance program analysis for the mediator (.3); conference with K. Sgambati re: research assignment re: sexual abuse exclusions in the GL policies and correspondence with B. Coffey and S. Korchinski re: same (.4); correspondence with L. Varga re: insurance archeology and underlying cases in connection with preparation of mediation statement (.2); correspondence with B. Coffey re: setting up call with M. Pierro of IAG re: insurance archeology (.2); confer with J. Jean re: policies, plaintiffs, limits and secondary evidence (.6).	3.90	3,896.10
J. D. Jean	08/24/22	Confer with PW team re: mediation.	0.60	847.80
J. D. Jean	08/24/22	Confer with S. Greenspan re: policies, plaintiffs, limits and secondary evidence.	0.60	847.80
J. D. Jean	08/24/22	Review and respond to emails re: policies, plaintiffs, limits and secondary evidence and re: coverage charts and mediation statement to mediator.	0.60	847.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/25/22	Correspondence with B. Coffey re: setting up call with M. Pierro of IAG re: insurance archaeology (.2); prepare for and attend conference with M. Pierro of IAG and B. Coffey re: location and analysis of GL policies in Madison Square program in preparation for mediation/mediation statement (1.0); review correspondence with M. Pierro re: insurance archeology issues in connection with preparation of insurance program analysis for the mediator (.2); review and analyze the management liability policies and the First Department decision construing them in connection with analysis of sexual abuse exclusions in GL policies and correspondence with S. Korschinki re: same (.4); review and analyze tender letters and responses sent to carriers on newly-discovered policies post-petition (.7); conference with J. Jean re: mediation and preparation of coverage chart and mediation statement (.3).	2.80	2,797.20
J. D. Jean	08/25/22	Confer with S. Greenspan re: mediation and preparation of mediation statement and coverage chart (.3); confer with S. Korchinski re: coverage issues, plaintiffs and damages (.3).	0.60	847.80
S. D. Greenspan	08/28/22	Conference with J. Jean re: mediation statement and evidence of insurance in same.	0.40	399.60
J. D. Jean	08/28/22	Confer with S. Greenspan re: mediation statement and evidence of insurance.	0.40	565.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/29/22	Prepare and revise draft mediation statement re: insurance program and insurance issues and extensive correspondence and conferences with Pillsbury and PW teams and policy review in connection with same (7.8); correspondence with J. Jean re: revisions to coverage chart to be provided to mediator (.2); review and analyze IAG coverage chart vs. Pillsbury coverage chart and revise Pillsbury coverage chart (.4); conference with PW team re: preparation of mediation statement concerning insurance issues (.5); correspondence with PW team re: refining the IAG coverage chart and reconciling the IAG and Pillsbury coverage charts and identification of areas needing resolution (.7); correspondence with PW team re: preparation and content of slotting chart.	9.60	9,590.40
B. J. Coffey	08/30/22	Review policy evidence and revise coverage chart (.3); conference with L. Varga at Paul Weiss, M. Pierro at IAG, and S. Greenspan to discuss policy evidence and coverage chart (.4); draft summary and assessment of quality of insurance secondary evidence (.4); correspondence with S. Greenspan re: revisions to mediation statement (.3).	1.40	655.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	08/30/22	Conference with PW team and B. Baker of Friedman Kaplan re: mediation and insurance coverage pursuit strategies (.8); conference with L. Varga re: revisions to coverage chart (.4); conference with M. Pierro of IAG and B. Coffey re: revisions to coverage chart and re: insurance archeology issues (.4); extensive correspondence with PW team re: same (.6); review Raphaelson Levine demand letter of October 27, 2021 for potential coverage under the GL policies, including all demands therein, and prepare correspondence to PW team analyzing same (1.2); review slotting chart and correspondence with PW team and M. Pierro re: impact on coverage chart of revisions to slotting chart (.6); review proposed revisions to draft mediation statement regarding the insurance program and insurance issues and revise same (2.7); extensive correspondence with PW team, J. Jean and B. Coffey re: revisions to same (.7); correspondence with L. Varga re: insurers accepting coverage/tender post-petition and review coverage correspondence in connection with same (.4); correspondence with PW team re: Covington report (.3); correspondence with PW team re: strategy call (.2); review memo re: secondary evidence of the Policies (in connection with preparation of mediation statement (.3).	8.60	8,591.40
J. D. Jean	08/30/22	Review and revise mediation memorandum and review policies re: same (1.2); review secondary evidence and follow up from call with PW team (.6).	1.80	2,543.40
J. D. Jean	08/30/22	Confer with S. Greenspan re: strategy.	0.40	565.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. J. Coffey	08/31/22	Calculate potential limits of insurance coverage (.2); conference with W. Clareman of PW, M. Pierro of IAG and S. Greenspan re: summary of insurance coverage value for mediator (.4); conference with S. Greenspan re: allocation of claimant demands to available insurance (.2); review claimant demands and alleged time frames of occurrences to allocate claims to available insurance coverage and calculate potential impact to insurers (1.4).	2.20	1,029.60
J. D. Jean	08/31/22	Review and revise multiple drafts of mediation statement re: insurance while reviewing secondary evidence and demands re: same.	1.30	1,836.90
J. D. Jean	08/31/22	Confer with S. Greenspan re: mediation memo and meeting with PW team.	0.80	1,130.40
Subtotal Task: 707 - Mediation			60.70	\$61,402.10
Total:			130.90	\$ 116,662.70

Time Summary By Task				
<u>Task</u>		<u>Hours</u>		<u>Amount</u>
702 - Asset Analysis and Recovery		69.20		54,860.60
705 - Fee/Employment Applications		1.00		400.00
707 - Mediation		60.70		61,402.10
Total	130.90			\$ 116,662.70

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
J. D. Jean	14.70	\$1,413.00	\$20,771.10
Senior Counsel			
B. L. Croutch	32.00	\$1,103.00	\$35,296.00
S. D. Greenspan	41.70	999.00	41,658.30
Subtotal	73.70		\$76,954.30

Other Attorney

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<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
B. J. Coffey	16.40	\$468.00	\$7,675.20
Senior Law Clerk			
K. Sgambati	6.20	\$540.00	\$3,348.00
Paralegal			
A. Iniguez	2.70	\$383.00	\$1,034.10
S. Korchinski	17.20	400.00	6,880.00
Subtotal	19.90		\$7,914.10
Total	130.90		\$116,662.70

Disbursements Incurred

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
07/01/22	Task E106 - Computer Research	Summary	\$3.50
08/10/22	Task E103 - Document Processing	Summary	111.75
08/26/22	Task E101 - Reproductions	Summary	70.56
08/09/22	Task E101 - Blowback - Color	Color Copying	12.40
08/26/22	Task E101 - Color Copy	08/2022 Document Printing Charges, Job # 8, S. Korchinski	1.20
08/29/22	Task E101 - Color Copy	08/2022 Document Printing Charges, Job # 3, S. Greenspan	0.40
08/09/22	Task E107 - Express Courier Service	FedEX to CLAIMS MANAGER SIRIUS INT. INSURANCE GROUP, L from BARBARA CROUTCH	124.52
08/11/22	Task E107 - Express Courier Service	Vendor: SF Express/Shun Feng Logistics - BJ; Invoice#: 081122; Date: 8/11/2022 - Beijing Courier bill- July 2022 C. Liu, courier fee for sending letter and documents to Claims Manager of China Minsheng Investment Corp on 07/29/2022, SH	5.90
Total Disbursements:			\$330.23

Disbursement Summary

<u>Type</u>	<u>Amount</u>
Pillsbury Winthrop Shaw Pittman LLP	

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Michael Kosnitzky

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Color Copying	14.00
Computer Research	3.50
Document Processing	111.75
Express Courier Service	130.42
Reproductions	70.56
Total:	\$330.23

Total Due For Matter 0000002: \$116,992.93



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

September 19, 2022
Invoice No. 8492222
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 116,662.70	\$ 330.23	\$ 116,992.93
Total This Invoice:	\$ 116,662.70	\$ 330.23	\$ 116,992.93

Payable in U.S. Dollars upon receipt.

Payment Options:

For payment by mail, remit to: Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to: JP Morgan Chase Bank NA, NY, NY; ABA# 021000021 (S.W.I.F.T. Code CHASUS33), for credit to Pillsbury Winthrop Shaw Pittman LLP, Account Number 301177087165.

Please include our client, matter and invoice number for proper credit.

[Additional remittance information may also be forwarded to accountsreceivable@pillsburylaw.com]



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

October 13, 2022
Invoice No. 8496584
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through September 30, 2022

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 121,623.40	\$ 2,643.67	\$ 124,267.07
Total This Invoice:	\$ 121,623.40	\$ 2,643.67	\$ 124,267.07

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

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Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through September 30, 2022

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
B. J. Coffey	09/02/22	Review and revise PW mediation statement for accuracy (.9); teleconferences with S. Greenspan and L. Varga at PW re: revisions to insurance descriptions in mediation statement and coverage chart (.9).	1.80	\$842.40
S. Korchinski	09/06/22	Review recent correspondence and filings (.3); revise document collection re: same (.3).	0.60	240.00
P. He	09/20/22	Review and analyze policies for claims coverage and disputes (.9); review and analyze insurance coverage chart (.3); preliminary review of correspondence from G. Hanscom of SiriusPoint re: policies (.2).	1.40	1,002.40
B. Fleishman	09/23/22	Review settlement provisions re: insurance.	0.60	753.60
P. He	09/23/22	Communicate with A. Iniguez re: policies, tenders, responses, charts and coverage strategy (1.2); research coverage litigation for sex abuse claims (.4); communicate with S. Greenspan re: coverage litigation, tenders, insurance policies, insurers' responses and claims strategy (.6); draft issues list and action plan (.6); review and analyze G. Hanscom of SiriusPoint's coverage correspondence (.3); review G. Hanscom communications re: claim and policy (.1).	3.20	2,291.20
A. Iniguez	09/23/22	Review letter from G. Hanscom, SiriusPoint in response to tender letter sent on August 9, 2022 (.1); update case chart of tender letters and responses with SiriusPoint's response (.1).	0.20	76.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	09/24/22	Communicate with S. Greenspan re: coverage litigation and claims strategy.	0.40	286.40
P. He	09/25/22	Communicate with S. Greenspan re: strategy and claims meeting with G. Hanscom of SiriusPoint (.3); review communications from G. Hanscom of SiriusPoint re: meeting and tender of claim (.1).	0.40	286.40

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P. He	09/26/22	Review communications from B. Baker of Friedman Kaplan re: Chubb's conduct, strategy for seeking recovery and challenged payments (.3); review communications from S. Greenspan re: recovery from Chubb and claims payments (.2); review input from A. Iniguez re: B. Baker's strategy for insurance and policies for tendering of claims (.1); call with M. Pierro of Insurance Archaeology Group re: Security Mutual, corporate entities, successor in interest of liabilities (.3); correspondence with M. Pierro of Insurance Archaeology Group re: policy underwriters, SiriusPoint, Security Mutual, entity formations and claims strategy (.6); attend videoconference meeting with G. Hanscom of SiriusPoint re: meeting and tender of claim (.5); correspond with G. Hanscom of SiriusPoint re: umbrella policy and Security Mutual's successor in interest (.5); perform research and analysis re: Security Mutual's successor in interest, corporate formations, acquisitions, insurance registration filings and SEC filings (1.5); review secondary evidence, analysis and materials re: Security Mutual and insurers (.6); review claims correspondence from Security Mutual Insurance Company (.2); draft outline of Security Mutual's successor in interest, topics and issues with policy and summary of claims (1.0); multiple communications with S. Greenspan re: meeting strategy, successor in interest of Security Mutual, investigation into identifying entities for claims coverage, policies, and input for correspondence with G. Hanscom of SiriusPoint (1.2); review dockets of similarly situated CVA claims and litigation for analysis and strategy (.7); draft summary re: postures, rulings and procedural history of CVA claims and litigation for analysis and strategy (.5); multiple communications and input with A. Iniguez re: policies subject to tender of claims, preparing letters in response to	9.20	6,587.20
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
		insurers, and strategy to pursue coverage (.6); review status of tenders and defense invoices (.2); review and analyze claims correspondence claims materials evidencing policies (.2).		
A. Iniguez	09/26/22	Prepare chart of all tender letters sent to insurance carriers in July and August 2022 (.3); organize all responses to tender letters (.2); add A. Gray suggested payment amounts for March 2, 2022 Friedman Kaplan invoices to case chart of Chubb payments (.9); add A. Gray suggested payment amounts for April 4, 2022 Friedman Kaplan invoices to case chart of Chubb payments (1.2); add A. Gray suggested payment amounts for May 4, 2022 Friedman Kaplan invoices to case chart of Chubb payments (.4); add A. Gray suggested payment amounts for June 7, 2022 Friedman Kaplan invoices to case chart of Chubb payments (.7).	3.70	1,417.10
S. Korchinski	09/27/22	Review orders (.7); calendar dates (.3); update correspondence (.2).	1.20	480.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	09/28/22	Attend meeting with B. Baker of Friedman Kaplan re: "claims coverage, defense cost and expenses reimbursement, duty to defend and strategy for defense of claims (.6); review communication from B. Baker of Friedman Kaplan re: complaint strategy for claims against Chubb, breach of duty to defend and improper billing deductions (.1); review and analyze draft complaint for claims against Chubb including breach of duty to defend and improper billing deductions for position arguments and response letter to Chubb (.4); review communications re: appeal to A. Gray invoice review and deductions (.1); communicate with A. Iniguez re: Chubb's reimbursement of improper deductions for Friedman Kaplan's invoices (.3); review and analyze deduction exhibits, invoices, and payments for reimbursement (.2); review and analyze memo re: strategy for appeal and recovery of defense expenses and costs (.4); communicate with S. Greenspan re: New York law for duty to defend, strategy for appeal and recovery of defense expenses and costs and Chubb's reimbursement of improper deductions for Friedman Kaplan's invoices (.4); perform legal research re: duty to defend, conflicts of interest, enforcement of litigation billing guidelines and improper deductions (1.8).	4.30	3,078.80
A. Iniguez	09/28/22	Review NetDocs and shared drive for litigation and billing guidelines (.3); confirm additional payments identified on Alan Gray Appeal Suggested Payments of August 4, 2020 Friedman Kaplan invoices by Chubb for (.4).	0.70	268.10
B. Fleishman	09/29/22	Review, analyze and strategize re: additional executory contract issue research.	0.50	628.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	09/29/22	Draft letter to Chubb re: claim update on Hector Bush #2 action (1.0); review court's order and decision on denying motion to dismiss and dismissal of Hector Bush #2 action (.2); review and analyze multiple correspondence from K. Mangino of Chubb re: coverage positions, participation in defense, imposition of litigation billing guidelines and conditions (.5); perform legal research and analysis re: enforceability of litigation billing guidelines, duty to defend, conflicts of interest, improper deductions, and reasonableness of defense counsel's fees (3.5); draft legal memo re: analysis, supporting authorities, status quo and current law of the enforceability of litigation billing guidelines, duty to defend, conflicts of interest, improper deductions, and reasonableness of defense counsel's fees (2.6); communicate with S. Greenspan re: strategy for correspondence to Chubb (.1); communicate with S. Greenspan re: agreements to billing guidelines, insurers' agreement to participate in defense of client; violation of New York law, strategies for reimbursement of improper deductions and full defense costs and fees from Friedman Kaplan (.6); communicate with A. Iniguez re: insurers' coverage position letters, insurers' agreement to participate in defense of client and client agreements to billing guidelines (.3).	8.80	6,300.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	09/30/22	Communicate with S. Greenspan re: strategy to recover outstanding expenses from Chubb, strategy for recovering of outstanding payments to client, insurance coverage and defense costs and expenses (.6); review communication from J. Jean re: strategy for recovering of outstanding payments to client and insurance coverage and defense costs and expenses (.1); review correspondences from M. Levi of PW re: case status, settlement, and releases (.2); review communications from B. Baker of Friedman Kaplan re: Chubb's participation of defense, billing issues, A. Gray review process and outstanding amounts owed to client (.4); communicate with A. Iniguez re: renewed tender to Chubb and tender to Puritan Insurance Company (.3); review claims summary for understanding of claims status (.1); communicate with S. Greenspan re: strategies and tender of claims to Puritan Insurance and renewed tender to Chubb for coverage of claims (.6); review and analyze National Union insurance policies (.1); review correspondences re: Puritan Insurance Company and coverages to formulate strategy (.2); perform research and factual investigation into Puritan Insurance Company (.7); communicate with B. Baker of Friedman Kaplan re: express agreements for defense costs and expenses, litigation billing guidelines, evidence of implied agreements and correspondences with Chubb re: defense and billing issues (.6); draft and finalize letter to Westport Insurance Company re: tender of insurance coverage and defense to Puritan Insurance Company (1.0); draft letter to Chubb re: renewed tender of claims (1.6).	6.50	4,654.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
A. Iniguez	09/30/22	Review Net Docs and shared drive for all Chubb-Federal correspondence (.3); prepare case folder for same (.1); search emails and NetDocs for responses from Arrow point Capital to 7.28.22 tender letter (.3); prepare copies of 13 complaints for enclosure to tender letter to Puritan Insurance (.2).	0.90	344.70
Subtotal Task: 701 - Case Administration			44.40	\$29,537.70

Task: 702 - Asset Analysis and Recovery

P. Blood	09/01/22	Research re: New York insurance trigger doctrine (3.6); research re: New York progressive injury coverage triggers (1.1).	4.70	\$2,538.00
S. D. Greenspan	09/01/22	Revise mediation statement re: insurance (5.5); correspondence with PW team re: same (1.4); review and analyze Covington & Burling report for potential production (.4); correspondence with PW team re: review and potential production of Covington & Burling report (.2); correspondence with J. Dodd re: Chubb review of defense invoices (.2).	7.70	7,692.30
P. Blood	09/02/22	Research re: New York law on latent disease, manifestation and exposure triggers (2.5); research re: New York law on emotional injury and bodily injury (1.3); draft summary of research and transmit to team (.5).	4.30	2,322.00
S. D. Greenspan	09/02/22	Conference with L. Varga and B. Coffey re: revisions to draft mediation statement (.6); revisions to draft mediation statement re: insurance including review of and corrections to suggested PW team revisions (3.3); correspondence with PW team re: same (.8); review final mediation statement and correspondence with mediator (.3); review and analyze results of trigger research re: emotional distress and cited caselaw (1.1).	6.10	6,093.90

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. Blood	09/03/22	Research caselaw re: trigger of coverage for emotional injuries in all jurisdictions.	4.40	2,376.00
P. Blood	09/06/22	Research caselaw re: sex abuse coverage trigger in all jurisdictions (1.9); draft summary of findings (.6).	2.50	1,350.00
S. D. Greenspan	09/06/22	Prepare for and attend conference call with PW and FK teams re: case status and strategy; (.8); review and analyze correspondence from L. Varga re: research assignment re: potential conflicts of interest in plan of reorganization and review and analyze prior similar research project (.5).	1.30	1,298.70
S. D. Greenspan	09/08/22	Correspondence with P. He and with L. Varga re: assignment re: potential conflict of interest issue (.1); correspondence with M. Levi re: scheduling mediation (.1); correspondence with P. He re: case strategy, litigation and claims materials (.2).	0.40	399.60
S. D. Greenspan	09/11/22	Correspondence with L. Varga re: scheduling mediation.	0.10	99.90
S. D. Greenspan	09/12/22	Correspondence with plaintiff's counsel re: questions re: coverage chart.	0.10	99.90
S. D. Greenspan	09/13/22	Review and analyze latest A. Gray audit and reduction of Friedman Kaplan defense invoice (.4); review and analyze results of additional trigger research re: emotional distress and cited caselaw (1.9); conference with plaintiffs' counsel and PW team and M. Pierro re: insurance coverage chart (.5); review Chubb/Alan Gray reductions of latest defense counsel invoices and strategize re: response (.4); correspondence with J. Jean re: response to the Chubb/Alan Gray defense counsel fee reductions (.4).	3.60	3,596.40
S. Korchinski	09/14/22	Revise document collection to include recent correspondence and court filings.	0.80	320.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	09/15/22	Review voicemail and email from SiriusPoint re: response to tender letter (.2); review secondary evidence of Security Mutual CGL policy in connection with same (.3).	0.50	499.50
S. Korchinski	09/15/22	Review document collection for Security Mutual policy information and tender letter for review.	0.30	120.00
P. Blood	09/16/22	Draft memorandum re: New York emotional injury and trigger doctrine.	2.60	1,404.00
S. D. Greenspan	09/16/22	Review coverage position letter from SiriusPoint re: response to tender letter (.2); conference with J. Jean re: same (.2).	0.40	399.60
P. Blood	09/17/22	Draft memorandum re: New York emotional injury and trigger doctrine.	0.10	54.00
S. D. Greenspan	09/19/22	Correspondence with PW team re: whether Madison had any potential exposure under the Adult Survivors Act and re: INA recovery issues and re: settlement strategy.	0.30	299.70
S. D. Greenspan	09/21/22	Review and analyze correspondence from plaintiffs' counsel and provided documents re: INA recovery issue (1.3); correspondence with plaintiffs' counsel re: same (.2); correspondence with B. Fleishman re: potential conflict issue research in connection with assignment of claims (.2).	1.70	1,698.30
S. D. Greenspan	09/22/22	Correspondence with plaintiffs' counsel and PW team re: INA recovery issue (.3); correspondence with M. Levi re: setting up strategy call (.2).	0.50	499.50

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	09/23/22	Correspondence with Pillsbury team re: tracking of our prior tender letters and status of insurers' responses to them and following up on letters (.4); review docket sheet in the Rockefeller University coverage against its insurers for the Dr. Archibald sex abuse liability and select key documents (.6); correspondence with B. Baker re: same (.2); correspondence with P. He re: assignment to follow up on tender letters to the carriers of newly discovered policies and conference with P. He re: same (.3); review correspondence from B. Baker re: development in the Bush case and re: preparation of letter informing Chubb of this development and correspondence to B. Baker in response (.2).	1.70	1,698.30
S. D. Greenspan	09/25/22	Correspondence with B. Baker and J. Jean re: response to A. Gray/Chubb reductions of defense counsel invoices and re: setting meeting re: same (.6); correspondence with P. He re: research assignment under New York law re: enforceability of litigation guidelines and panel counsel rates (.2); correspondence with SiriusPoint re: setting up conference to discuss response to tender letter (.2); correspondence with M. Pierro re: tender to SiriusPoint of the Security Mutual claim in connection with response to SiriusPoint coverage position letter (.3).	1.30	1,298.70
B. Fleishman	09/26/22	Research re: recovery under anti-assignment clauses of liability insurance policies (.8); confer with J. Jean re: same (.2).	1.00	1,256.00

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S. D. Greenspan	09/26/22	Correspondence with M. Pierro re: search for successor company to 1967-68 CGL insurer Security Mutual (.2); correspondence and conference with P. He re: preparation for conference with G. Hanscom of SiriusPoint re: follow up to our tender of 38 CVA claims under the Security Mutual policy and re: research on enforceability of panel counsel rates for defense counsel and correspondence with G. Hanscom re: setting up the conference (.3); review and analyze corporate history research of Security Mutual, prior correspondence re: search for Security Mutual successor and tender letters to and coverage correspondence with SiriusPoint and other potential Security Mutual successors to identify potential successor company and prepare for conference with claims executive from SiriusPoint to respond to his letter's contention that SiriusPoint has no relationship with Security Mutual (.7); conference with G. Hanscom of SiriusPoint and P. He re: follow up to our tender on behalf of Madison Square of 38 CVA complaints and response to G. Hanscom's initial claim that SiriusPoint has no relationship with Security Mutual (.5); review recent coverage correspondence with Chubb re: Chubb's information requests (.2); review tender list of complaints tendered to Security Mutual (.2); review and analyze reports/charting of A. Gray reductions of defense counsel invoices in connection with objections to same (.4); correspondence with P. He: re: updating Chubb on developments in underlying CVA action (.1); correspondence with P. He re: information to provide to SiriusPoint re: evidence of the Security Mutual policy (.2); correspondence with M. Pierro of IAG re: search for Security Mutual Policy (.2); confer with J. Jean re: assignment strategy (.3); confer with J. Jean re: defense costs (.4).	3.70	3,696.30
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	09/27/22	Correspondence with P. He re: results of review of docket sheet items in Rockefeller University's coverage action.	0.20	199.80
S. D. Greenspan	09/28/22	Conference with B. Baker and P. He re: response to A. Gray fee reductions and Chubb's application of litigation management guidelines and panel counsel hourly rates (.6); review strategy memo on the defense cost issue in connection with development of strategy to address the issue (.2); review documents re: Chubb's payment of defense counsel invoices on a successful appeal (.2).	1.00	999.00
S. D. Greenspan	09/29/22	Correspondence with Pillsbury team re: response to Chubb's prior requests for information and review coverage letter to Chubb (.2); review prior correspondence with Chubb and A. Gray re: dispute over A. Gray reductions of defense counsel invoices including application of litigation management buildings and Chubb's refusal to pay defense counsel's rates (.6).	0.80	799.20
P. Blood	09/30/22	Legal research re: distinguishing NY case law and treatment emotional injury comparing national decisions on the issue (1.2); whether post-abuse emotional injury relates back to the incident of abuse (.8).	2.00	1,080.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	09/30/22	Review and revise draft letter to Chubb following up on the renewed tender letter dated 7/28/2022 and correspondence with P. He re: same (.3); review and revise draft letter to Chubb re: update in the lawsuit captioned: Hector Bush, et al. v. Madison Square Boys & Girls Club, Inc. (Index No. 950580/2020) and correspondence with P. He re: same (.2); review and analyze letters from Federal agreeing to defend under a reservation of rights to Bush #2 and Robert Liguori actions in connection with response to Federal's refusal to pay defense counsel's full rates and its reductions of defense counsel invoices through application of its litigation guidelines and correspondence with P. He re: same (.4); correspondence with B. Baker and J. Jean re: strategy for correspondence with Chubb re: its performance on the duty to defend the CVA claims (.2); correspondence with P. He re: tendering to Westport Insurance Corporation as successor to Puritan Insurance Company (.2); correspondence with B. Baker re: Chubb billing guidelines (.2); review draft tender letter to Puritan and approve and correspondence with P. He re: same (.2).	1.70	1,698.30

Subtotal Task: 702 - Asset Analysis and Recovery	55.80	\$45,886.90
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Task: 705 - Fee/Employment Applications

A. V. Alfano	09/01/22	Respond to questions from S. Korchinski re: fee application process (.2, .1, .1, .1, .3); review interim compensation procedures and UST rules in respect of same (.4); analyze potential issues re: fees/interim compensation (.5); mark up of monthly fee statement (.2).	1.90	\$1,675.80
A. V. Alfano	09/02/22	Call from S. Korchinski re: monthly fee statement filing process.	0.10	88.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. Korchinski	09/02/22	Revise and finalize Pillsbury's first fee statement to be filed with the bankruptcy court.	1.00	400.00
S. Korchinski	09/14/22	Draft tables for September fee statement.	1.20	480.00
A. V. Alfano	09/15/22	Confer with S. Korchinski re: fee statement (.1, .1, .1); review of first amended fee statement to ensure compliance with fee guidelines (1.2); email to S. Korchinski and S. Greenspan re: fee statement issues (.5).	2.00	1,764.00
S. Korchinski	09/16/22	Conference with S. Greenspan re: revisions to first fee statement.	0.10	40.00
A. V. Alfano	09/20/22	Review/revise amended monthly fee statement (.5); email exchanges with S. Korchinski re: amended monthly fee statement (.1, .1, .1, .1, .1); brief quality check of monthly fee statement (.1).	1.10	970.20

Subtotal Task: 705 - Fee/Employment Applications	7.40	\$5,418.20
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Task: 707 - Mediation

J. D. Jean	09/01/22	Review Covington report and mediation brief.	0.90	\$1,271.70
S. D. Greenspan	09/02/22	Confer with J. Jean re: draft mediation statement.	0.20	199.80
J. D. Jean	09/02/22	Review and revise mediation statement (.4); confer with S. Greenspan re: same (.2).	0.60	847.80
S. D. Greenspan	09/13/22	Conference with PW team and M. Pierro re: settlement and mediation strategy and re: trigger of coverage issues (.2); confer with J. Jean re: response to requests from plaintiffs' lawyers (.3); correspondence with PW team and B. Baker re: preparation for conference with plaintiffs re: insurance and mediation (.4).	0.90	899.10

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	09/13/22	Review emails re: coverage triggers and mediation positions (.3); review assumptions re: coverage triggers (.2); review emails from Paul Weiss team re: requests by plaintiffs' lawyers (.3); confer with S. Greenspan re: response (.2); confer with S. Greenspan re: strategy re: responding to and objecting to A. Gray reductions of FK's bills (.4).	1.40	1,978.20
S. D. Greenspan	09/14/22	Correspondence with PW team re: setting up a call with mediator (.2); correspondence with J. Jean re: Chubb (Federal) and insurer strategy and responses (.4).	0.60	599.40
J. D. Jean	09/14/22	Analysis re: mediation (.2); emails re: plaintiffs' claims (.2); confer with S. Greenspan re: Chubb and insurer strategy and responses (.4).	0.80	1,130.40
S. D. Greenspan	09/15/22	Correspondence and conferences with PW team and J. Jean re: mediation.	0.30	299.70
J. D. Jean	09/15/22	Emails and conferences with S. Greenspan and PW team re: mediation (.2); conference re: Security Mutual (.1).	0.30	423.90
J. D. Jean	09/16/22	Review correspondence from SiriusPoint (.2); confer with S. Greenspan re: same (.2).	0.40	565.20
S. D. Greenspan	09/19/22	Correspondence with PW team re: preparation for call with mediator and plaintiffs (.4); prepare for and attend mediation conference call with Judge Chapman, PW team and plaintiffs (2.1); correspondence with W. Clareman and J. Jean re: mediation (.2); correspondence with P. Blood re: status of trigger research for mediation (.2); conference with J. Jean re: call with mediator/committee (.3).	3.20	3,196.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	09/19/22	Review materials in preparation for call with mediator and victims committee (.8); confer with S. Greenspan re: mediator/committee call (.3); attend conference with mediator and committee (.7); follow up with PW team re: mediation, insurance and committee (.3); review materials re coverage (.6).	2.70	3,815.10
P. He	09/20/22	Review and analyze mediation briefs and summaries.	1.60	1,145.60
S. D. Greenspan	09/21/22	Review and analyze policies in connection with preparation for mediation including PowerPoint deck.	1.60	1,598.40
B. Fleishman	09/22/22	Confer with J. Jean re: mediation.	0.20	251.20
S. D. Greenspan	09/22/22	Correspondence with B. Fleishman and J. Vazquez re: assignment re: evaluation of any potential conflicts in connection with settlement and assignment (.3); correspondence with PW and Pillsbury teams re: scheduling the mediation session (.2); confer with J. Jean re: response to emails re: coverage issues and arguments re: trigger (.3); confer with J. Jean re: mediation (.2).	1.00	999.00
J. D. Jean	09/22/22	Review and respond to emails re: coverage issues and arguments re: trigger (.6); confer with S. Greenspan re: response (.3); confer re: settlement trusts and assignment of claims and research re: same (.7); confer re: mediation with PW team (.3); confer with S. Greenspan re: mediation (.2); confer with B. Fleishman re: mediation (.2).	2.30	3,249.90
B. Fleishman	09/23/22	Confer with J. Jean re: mediation and coverage strategy.	0.60	753.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	09/23/22	Prepare for and attend conference with PW team re: preparation for mediation (.7); prepare for and attend conference with PW team and FK team re: preparation for mediation (.8); correspondence with PW and Pillsbury teams re: scheduling mediation session (.4); correspondence with J. Vazquez re: assignment re: potential objections to any settlement (.3); correspondence with PW team, B. Baker and R. Chui re: preparation of PowerPoint deck for the mediation (.3); review and analyze draft mediation settlement offer for insurance issues (.5); correspondence with J. Jean and B. Fleishman re: same and re: any anti-assignment clauses in the policies (.6); review and analyze Teneo matrix of plaintiff cases and potential payout chart in connection with preparation of PowerPoint for mediation (.2).	3.80	3,796.20
J. D. Jean	09/23/22	Conference with PW team re: mediation strategy (.6); confer with S. Greenspan re: coverage and damages (.6); confer with B. Fleishman re: strategy (.6).	1.80	2,543.40
S. D. Greenspan	09/25/22	Correspondence with J. Vazquez, J. Jean and B. Fleishman re: effect, if any, of anti-assignment provisions in insurance policies and enforceability of same, provisions in the proposed settlement offer re: assignment of insurance rights and research assignment re: same (.4); correspondence with P. Blood re: status of trigger research for mediation (.2).	0.60	599.40
J. D. Jean	09/25/22	Confer with S. Greenspan re: tender and coverage.	0.60	847.80
S. D. Greenspan	09/26/22	Review and analyze summary of underlying abuse claims in connection with preparation for mediation (.3); correspondence with B. Fleishman and review research results re: whether anti-assignment clauses apply to post-lost assignments in New York in connection with mediation (.6).	0.90	899.10

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	09/26/22	Confer with S. Greenspan re: assignment strategy (.3); confer with B. Fleishman re: same (.2); analysis re: defense costs and confer with S. Greenspan re: same (.4).	0.90	1,271.70
S. D. Greenspan	09/27/22	Review correspondence to G. Hanscom of SiriusPoint re: corporate history shows successorship of SiriusPoint to Security Mutual and providing overlying umbrella policy and review G. Hanscom response.	0.20	199.80
S. D. Greenspan	09/28/22	Correspondence with PW team re: preparation of insurance PowerPoint for mediation.	0.20	199.80
S. D. Greenspan	09/29/22	Review and analyze research memorandum re: enforceability of litigation management guidelines and re: insurer-approved hourly rate re: the insurers' duty to defend Madison (.9); correspondence with P. He re: same (.2).	1.10	1,098.90
S. D. Greenspan	09/30/22	Correspondence with PW team, Pillsbury team and B. Baker re: settlement of certain Rockefeller University cases where Madison Square was also released and impact on mediation and reporting to Chubb (.6); review correspondence to judge in underlying actions re: settlement (.2).	0.80	799.20
J. D. Jean	09/30/22	Confer re: Chubb (.2); correspondence re: Chubb and trigger/multiple trigger issues (.7); review research re: emotional distress (.4).	1.30	1,836.90
Subtotal Task: 707 - Mediation			31.80	\$37,317.00

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Task: 709 - Plan and Disclosure Statement

J. N. Vazquez	09/29/22	Review recently discovered historical policy documents to determine if assignment language and/or duties imputed on insureds change analysis of assignability of policies to trust (3.0); prepare chart of provisions re: same (1.1); call re: same (.3).	4.40	\$2,890.80
Subtotal Task: 709 - Plan and Disclosure Statement			4.40	\$2,890.80

Task: 710 - Litigation

P. He	09/08/22	Communicate with S. Greenspan re: case strategy, procedural posture and coverage litigation for sex abuse claims and claims materials.	0.50	\$358.00
P. He	09/13/22	Review communications from S. Greenspan re: insurance coverage, policy definitions and strategy for coverage chart.	0.30	214.80
Subtotal Task: 710 - Litigation			0.80	\$572.80
Total:			144.60	\$ 121,623.40

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Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	44.40	29,537.70
702 - Asset Analysis and Recovery	55.80	45,886.90
705 - Fee/Employment Applications	7.40	5,418.20
707 - Mediation	31.80	37,317.00
709 - Plan and Disclosure Statement	4.40	2,890.80
710 - Litigation	0.80	572.80
Total	144.60	\$ 121,623.40

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
J. D. Jean	14.00	\$1,413.00	\$19,782.00
Senior Counsel			
B. Fleishman	2.90	\$1,256.00	\$3,642.40
S. D. Greenspan	48.50	999.00	48,451.50
Subtotal	51.40		\$52,093.90
Associate			
P. He	36.60	\$716.00	\$26,205.60
J. N. Vazquez	4.40	657.00	2,890.80
Subtotal	41.00		\$29,096.40
Senior Associate			
A. V. Alfano	5.10	\$882.00	\$4,498.20
Other Attorney			
B. J. Coffey	1.80	\$468.00	\$842.40
Senior Law Clerk			
P. Blood	20.60	\$540.00	\$11,124.00
Paralegal			
A. Iniguez	5.50	\$383.00	\$2,106.50
S. Korchinski	5.20	400.00	2,080.00
Subtotal	10.70		\$4,186.50
Total	144.60		\$121,623.40

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Disbursements Incurred

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
09/29/22	Task E106 - Computer Research	Summary	\$2,630.92
09/14/22	Task E103 - Document Processing	Summary	12.75
Total Disbursements:			\$2,643.67

Disbursement Summary

<u>Type</u>	<u>Amount</u>
Computer Research	2,630.92
Document Processing	12.75
Total:	\$2,643.67



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

October 13, 2022
Invoice No. 8496584
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 121,623.40	\$ 2,643.67	\$ 124,267.07
Total This Invoice:	\$ 121,623.40	\$ 2,643.67	\$ 124,267.07

Payable in U.S. Dollars upon receipt.

Payment Options:

For payment by mail, remit to: Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to:

Please include our client, matter and invoice number for proper credit.
[Additional remittance information may also be forwarded to accountsreceivable@pillsburylaw.com]



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

November 15, 2022
Invoice No. 8502959
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through October 31, 2022

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery <i>Discount</i>	\$ 524,069.40 (149,348.45)	\$ 278.05	\$ 524,347.45 (149,348.45)
Total This Invoice:	\$ 374,720.95	\$ 278.05	\$ 374,999.00

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Prior Invoices Outstanding

<u>Invoice Number</u>	<u>Date</u>	<u>Invoice Amount</u>	<u>Payments/ Adjustments</u>	<u>Total Prior Outstanding</u>
8488135	08/31/22	\$121,608.83	\$15,109.90	\$106,498.93
8492222	09/19/22	116,992.93	0.00	116,992.93
8496584	10/13/22	124,267.07	0.00	124,267.07
Total Prior Outstanding		\$362,868.83	\$15,109.90	\$347,758.93
Total Amount Outstanding				\$722,757.93

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
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Michael Kosnitzky

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Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through October 31, 2022

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
A. Iniguez	10/04/22	Review correspondence from Jefferson Insurance agreeing to participate on the defense of Madison in matters M.H., Bush #2, Bush #3, Castrillo and G.F. (.2); organize all invoices for each matter from 2020 to present to send to Jefferson insurance for payment (1.6); prepare Friedman Kaplan invoice chart for dates sent to Jefferson Insurance and dates of payment (.8).	2.60	\$995.80
S. Korchinski	10/04/22	Draft J. Jean supplemental declaration re: disclosure of pre-petition fees and expenses.	0.60	240.00
A. Iniguez	10/05/22	Update Master list of all tenders and responses with letter to Westport Insurance tender of 14 complaints (.2); update Friedman Kaplan invoice chart with Chubb payments for all invoices dated 3/222, 4/4/22, 5/4/22 and 6/7/22 (2.9); respond to specific items in draft email to Chubb re: missing payments (.8); add Chubb file numbers to Friedman Kaplan Chubb Invoice Chart from review of Chubb correspondence and Chubb check payments (.7).	4.60	1,761.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
A. Iniguez	10/06/22	Review prior correspondence to Chubb Insurance and Friedman Kaplan insurance for litigation information (.3); prepare list of all letters and response letters for tender of GF case (.2); prepare list of all letters and responses for tender of Castrillo (.3).prepare list of all letters and responses for tender of Hector Bush #2 and Hector Bush #3 (.6); conference with P. He re: the foregoing (.4).	1.80	689.40
A. Iniguez	10/08/22	Prepare folders on shared drive of all tender letters to and response letters from AIG (.9); prepare folders on shared drive of all tender letters to and response letters from Chubb (1.3); prepare folders on shared drive of all tender letters to and response letters from General Starr (.8); Prepare folders on shared drive of all tender letters to and response letters from Jefferson (.9); prepare folders on shared drive of all tender letters to and response letters from Monarch (.7); prepare folders on shared drive of all tender letters to and response letters from North Star (.7); prepare chart re: same with ROR responses (.6); draft tender letter to Great Atlantic (1.3).	7.20	2,757.60
A. Iniguez	10/12/22	Update correspondence chart with letter received from David Walters stating that Security Mutual was the incorrect company in this action.	0.20	76.60
A. Iniguez	10/13/22	Review NetDocs and shared drive folders for earliest tender letters sent to insurance carriers (.6); review NetDocs and shared drive folders for all correspondence sent L. Klein, M. Plevin and K. Magino from Chubb Insurance (.7); emails re: Friedman Kaplan invoice totals (.3); review NetDocs for secondary evidence of policies (.2).	1.80	689.40
B. J. Coffey	10/14/22	Review new policy evidence and revise coverage chart with new information.	1.90	889.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
A. Iniguez	10/14/22	Update chart of cases Chubb agreed to participate in its defense with additional cases agreed to in letter 10.14.22 (1.4); confirm dates of alleged abuse of dates in 10.14.22 Chubb agreement (.8); review all 87 complaints and amended complaints to confirm and chart all dates of alleged abuse of plaintiffs (2.8); correspondence with P. He re: strategy to review Chubb's coverage position letters to ensure accuracy on its coverage analysis (.4); identify all plaintiffs in all cases with alleged abuse dates between 11/1/22 to 11/1/79 (.9).	6.30	2,412.90
B. J. Coffey	10/17/22	Review policy evidence produced by AIG and revise coverage chart (1.9); research current status of newly discovered historical insurer (.6); conference with M. Pierro of IAG re: analysis of new policy evidence and chart revisions (.4).	2.90	1,357.20
A. Iniguez	10/17/22	Review NetDocs and shared drive folders for prior tender letters and responses from AIG as to the MH case and correspondence with P. He re: same (.6); review email from AIG re: new handler M. Bergman (.2).	0.80	306.40
B. Fleishman	10/19/22	Conference with B. Baker and S. Greenspan re: Chubb's request for production of report.	0.40	502.40
A. Iniguez	10/20/22	Review emails for case correspondence to Chubb (.2); correspondence with P. He re: tender to Puritan (.2); upload case documents from Friedman Kaplan to shared drive folder (.3); update master correspondence chart (.2).	0.90	344.70
B. J. Coffey	10/25/22	Review and revise list of known policies that potentially respond to abuse claims.	0.40	187.20
B. Fleishman	10/25/22	Confer with J. Jean re: responsive data to support payment (.4); confer with J. Jean and S. Greenspan re: revisions to draft damages estimate to insurers (.3).	0.70	879.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
B. J. Coffey	10/28/22	Review policy evidence provided by Mount Vernon Fire Insurance and United States Liability Insurance and compare against existing policies (.3); correspondence with S. Greenspan re: response to request for other policies from Mount Vernon/USA (.3).	0.60	280.80
B. Fleishman	10/28/22	Correspondence with S. Greenspan re: protection of Madison's privileges.	0.20	251.20
Subtotal Task: 701 - Case Administration			33.90	\$14,621.80

Task: 702 - Asset Analysis and Recovery

S. D. Greenspan	10/01/22	Revise, finalize and send letters to K. Mangino of Chubb and then J. Robinson of Chubb: (1) following up on the tender letter of July 28, 2022; and (2) informing Chubb of developments in the Hector Bush 2 case and correspondence with P. He re: preparation of same (.7); correspondence with M. Levi re: submission of defense counsel invoices to Chubb in light of the bankruptcy and with P. He re: submission to Chubb (.2).	0.90	\$899.10
J. D. Jean	10/01/22	Confer re: coverage correspondence and responses.	0.30	423.90
S. D. Greenspan	10/02/22	Review prior FK invoices and prior invoice correspondence sent to Chubb in connection with sending new invoices to Chubb and correspondence with P. He and A. Iniguez re: need to send July FK invoice to Chubb (.2); review July FK invoices in connection with potential submission to Chubb for reimbursement (.2); correspondence with P. He re: contents of draft coverage letter to Chubb re: payment of FK invoices (.2)	0.60	599.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	10/03/22	Correspondence with B. Baker and PW team re: several CVA plaintiffs settling their actions and dismissing Madison and re: impact on the insurance coverage (.4); correspondence with Pillsbury team re: notifying carriers regarding same (.2); review and analyze Stipulation of Discontinuance of dismissed CVA claims for any impact on insurance coverage(.3); review and analyze correspondence between Chubb and FK and Chubb billing guidelines in connection with preparation of coverage letter on defense cost issues (.4); correspondence with B. Baker and P. He re: same (.3).	1.60	1,598.40
S. D. Greenspan	10/03/22	Correspondence with J. Robinson of Chubb re: coverage correspondence previously sent to K. Mangino who is no longer on the file and re: assignment of new claims handler J. Biondolillo (.2); correspondence with P He re: Chubb claim handling (.2); correspondence with J. Jean re: strategy for preparation of defense costs payment demand for Chubb (.3); review and analyze letter from Jefferson Insurance Company of New York accepting tender and agreeing to defend under a reservation of rights and strategize re: response (.4); correspondence with P. He re: response to Jefferson acceptance letter (.4).	1.50	1,498.50

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	10/03/22	Review and analyze correspondences between Friedman Kaplan and Chubb for agreement terms and conditions for participation in defense, billing guideline evidence, limitations imposed by Chubb, billing arrangements, and analysis of client agreement to billing guidelines (.6); discuss with S. Greenspan and B. Baker of Friedman Kaplan re: agreement to litigation management guidelines (.2); communicate with A. Iniguez re: strategy for response to Jefferson's information request for billing invoices, tenders, insurers' responses and compiling invoices for submittal (.7); review outstanding invoices for defense costs from Friedman Kaplan for submission to Chubb (.2); review and analyze letter from D. Lisner, counsel for Rockefeller University, re: settlement and resolution of 5 plaintiff claims (.1); draft letter to J. Biondolillo of Chubb re: status update of Liguori Action (.8); review communications from B. Baker of Friedman Kaplan and Alan Kornberg of Paul Weiss re: settlement of 5 plaintiffs claims in the Liguori Action (.3); review J. Robinson of Chubb correspondences re: claims handler and transition (.2); correspondence with Pillsbury team re: strategy to recover reimbursement for defense costs and expenses for client, rate differential, and insurance policy lacking litigation billing guidelines (.3); review stipulation of discontinuance for the Liguori Action of 3 plaintiffs and communicate with S. Greenspan re: strategy to inform Chubb and stipulation of discontinuance, respond to Jefferson's coverage letter, submission of invoices and lists of tenders and statuses (.6); review and analyze Jefferson Insurance Company's coverage letter (.6); perform further legal research and analysis re: enforceability of litigation billing guidelines, duty to defend and	7.40	5,298.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
		reasonableness standard and factors for defense counsel's fees (2.0); draft legal memo re: analysis and supporting authorities of the enforceability of litigation billing guidelines, duty to defend and reasonableness standard and factors for defense counsel's fees (.8).		
A. Iniguez	10/03/22	Add information from 8.15.22 Friedman Kaplan invoices for billing through 7.31.22 to case chart.	0.70	268.10

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	10/04/22	Correspondence with K. Mangino of Chubb re: transfer of claim file to J. Biondolillo going forward and re: future handling/correspondence (.2); correspondence with P. He re: notifying Chubb of underlying case dismissals (.2); review draft letter to Chubb claims handling notifying Chubb of dismissal of Madison by 3 underlying CVA plaintiffs (.3); review and analyze research memo re: enforceability of litigation billing guidelines and conflicts of interest to duty to defend in connection with preparation of coverage letter to Chubb re: defense cost issues (.4); correspondence with P. He, B. Baker and M. Levi re: confirming which CVA plaintiffs dismissed Madison (for purposes of reporting to insurers) (.2); correspondence with M. Pierro re: insurance archival investigation of the prefix "GLA" issued by Security Mutual in connection with locating the successor to the 1967-68 Security Mutual CGL policy issued to Madison (.2); correspondence with P. He re: preparation/gathering of defense counsel invoices for submission to Jefferson Insurance Company of New York/Allianz for payment given its agreement to defend under a reservation of rights (.2); review/revise/finalize draft email to J. Biodiolillo of Chubb transmitting defense counsel invoices and correspondence with Pillsbury team re: same (.2); correspondence with Pillsbury team re: preparation of coverage letters to Chubb demanding that it respond to Madison's tenders under the recently discovered Chubb policies, re: status of latest AIG coverage positions and re: coverage correspondence chart (.4); review and analyze latest AIG coverage position letter and strategize re: response (.4).	2.70	2,697.30

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	10/04/22	Further review and analysis of 52 outstanding invoices for defense costs from Friedman Kaplan for submission to Chubb (1.2); multiple communications with A. Iniguez re: payments rendered by Chubb, demands for invoice payments, outstanding billing invoices, insurers' responses, invoices for Jefferson's reimbursement for defense, reimbursement payments received by client (.8); review, analyze, and prepare strategy for invoices to seek Jefferson's reimbursement for client's defense (.6); draft letter to J. Biondolillo of Chubb re: status update of Liguori Action (.2); communications with B. Baker of Friedman Kaplan and Alan Kornberg of PW re: settlement of 5 plaintiffs' claims in the Liguori Action (.6); communicate with M. Pierro of Insurance Archaeology Group regrading Security Mutual's background and proper entity for insurance recovery (.4); correspondence with S. Greenspan re: strategy for Luguori settlement (notifying Chubb of dismissals), release and discontinuing of action, submission of invoices, recovery of reimbursement for Chubb's outstanding invoices, insurers' responses to tenders, follow-up letters to insurers for recovery under coverage, Jefferson Insurance Company's coverage position and information request, and tracing payments to client for defense costs and expenses, client communications with J. Dold concerning invoice payment statuses (1.3); draft correspondence to Chubb re: submission of July invoices, demand for outstanding reimbursements for payment on invoices (2.4); draft correspondence to Jefferson Insurance Company re: coverage position, participation in defense, reimbursement of invoices (.6); communicate with client, J. Dold, re: invoice payment statuses (.4); review and analyze missing payments and payments furnished to client from Chubb	8.80	6,300.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
		(.3).		
S. D. Greenspan	10/05/22	Review and analyze Tender Chart of tenders to carriers and responses (.6); correspondence with P. He re: suggested revisions to Tender Chart (.3); correspondence with P. He and J. Dold re: status of Chubb reimbursement of defense counsel invoices in connection with preparation of correspondence to Chubb seeking payment of unpaid defense counsel invoices and review record of Chubb's latest payments and its deficiencies (.4); review and revise draft email to Chubb claims handler re: Chubb's failure to pay submitted defense counsel invoices (.9); correspondence with P He re: needed revisions to same (.3).	2.50	2,497.50

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	10/05/22	Draft correspondence to Jefferson Insurance Company re: coverage position, participation in defense, reimbursement of invoices, response to request for information re: tenders and statuses (3.3); review and analyze Jefferson Insurance Company's coverage position letter (.6); identify and analyze invoices for submission to Jefferson Insurance Company (.3); correspondence with client, J. Dold, re: proof of payments and reimbursement payment information from Chubb (.2); review and analyze payments from Chubb for reimbursement (.4); communications with S. Greenspan re: strategy to inquire of Chubb renewed tenders, AIG coverage disclaimers, various insurers' disclaimers, newly produced policies and secondary evidence, correspondence strategy to Chubb for reimbursement payments on FK invoices, strategy to dispute defense costs with Chubb and Alan Gray deductions (.6); communications with A. Iniguez re: Chubb for reimbursement payments on FK invoices (1.1); draft multiple correspondences to J. Biondolillo of Chubb re: dispute of payments and demand for reimbursement of outstanding FK invoices that have not yet been reimbursed, no payments made on several invoices based on Alan Gray deductions, and partial payments based on Alan Gray deductions (3.3).	9.80	7,016.80
S. D. Greenspan	10/06/22	Correspondence with P. He, B. Baker and M. Levi re: confirming which CVA plaintiffs dismissed Madison (for purposes of reporting to insurers).	0.20	199.80

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P. He	10/06/22	Review correspondence from M. Levi of PW re: case update and settlement of certain plaintiffs in Liguori action and review and analyze updated coverage chart (.2); correspondence with S. Greenspan re: strategy for insurance coverage denials, response to Jefferson Insurance Company, inquiries and demand strategy to insurers refusing coverage (.3); draft correspondence to Jefferson Insurance Company re: coverage position, participation in defense, reimbursement of invoices, response to request for information, and multiple tables containing status of tenders and insurer responses (6.7); analyze Jefferson Insurance Company's coverage position letter (.2); perform investigation, analysis, and gathering of information and documents for response to Jefferson Insurance Company's request (3.4); discuss with A. Iniguez re: status of insurance policy tenders and responses, and responses to Chubb's information request (.4); conference/correspondence with B. Baker of Friedman Kaplan re: status of Jefferson Insurance Company's coverage position and strategy for response to request for information (.4).	11.60	8,305.60
S. Korchinski	10/06/22	Revise document collection to include recent correspondence with insurers.	0.20	80.00

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S. D. Greenspan	10/07/22	Conference with B. Baker and P. He re: response to Allianz's RFIs re: the cases it agreed to defend under a reservation of rights (.6); review initial draft letter to Jefferson/Allianz responding to its letter agreeing the defend the CVA Actions under a reservation of rights and propounding RFIs (.3); review and analyze draft Rule 2004 motion in connection with preparation of coverage position letters (.3); correspondence and conference with B. Baker re: responding to Jefferson/Allianz's RFIs (.8); correspondence with P. He re: Gen Re coverage position and re: preparation of response to the Gen Re RFIs (.4); correspondence with P. He and A. Iniguez re: review of insurers' coverage position letters to verify which insurers reserved rights versus denied coverage (.2); review coverage correspondence with the Delaware Department of Insurance re: pursuit of coverage for the insolvent Great Atlantic policy (.3); review/analyze New York law re: potential pursuit of Great Atlantic claim through the New York Property/Casualty Insurance Security Fund administered by the New York Liquidation Bureau (.6); correspondence with P. He re: same (.4); leave voicemail to and prepare and revise email to J. Bullen of Allianz providing an initial response to Jefferson/Allianz's letter agreeing to defend under a reservation of rights and requesting information and informing it of Madison's reorganization case and the mediation (.7); correspondence with P. He re: revisions to the letter to J. Bullen responding to Jefferson/Allianz's letter agreeing to defend under a reservation of rights and requesting information (.2).	4.80	4,795.20

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P. He	10/07/22	Attend conference meeting with B. Baker re: strategy for response to request for information from insurers and Jefferson Insurance Company (.6); communicate with B. Baker re: strategy for response to request for information from insurers (.3); review and analyze, AIG, North Star and Monarch's response to tenders and formulate strategy to respond to request for information (1.9); correspondence with S. Greenspan re: strategy to respond to insurers' reservation of rights, request for information, evaluation of CGL and umbrella policies, tenders to New York Liquidation Bureau for claims to Great Atlantic Insurance, response to Jefferson Insurance Company and request for information, letters to Chubb for defense costs (1.2); review and analyze correspondence from J. Miceli on behalf of Insurance Commissioner of Delaware for Great Atlantic Insurance to formulate strategy to New York Liquidation Bureau for tenders (.2); draft and review correspondence to J. Bullen of Allianz for response to Jefferson Insurance Company's coverage letter (1.6).	5.80	4,152.80
A. Iniguez	10/07/22	Prepare folders on shared drive of all tender letters to and response letters from Great Atlantic Insurance.	0.90	344.70
S. Korchinski	10/07/22	Review recent correspondence and update relevant document collections.	3.20	1,280.00
S. Korchinski	10/07/22	Review materials for draft joint defense agreement.	0.40	160.00
S. D. Greenspan	10/08/22	Correspondence with P. He re: pursuit of Great Atlantic claim through the New York Property/Casualty Insurance Security Fund administered by the New York Liquidation Bureau (.3); correspondence with P. He re: review of prior coverage position letters and drafting of new ones (.3); correspondence with P. He re: preparation of tender letter to the NYLB (.2).	0.80	799.20

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P. He	10/08/22	Correspondence with S. Greenspan re: strategy for notice to New York Liquidation Bureau for claims to Great Atlantic Insurance, duty to defend, and supporting authority forbidding allocation away from uncovered claims (.8); draft, review, and revise letter to notify New York Liquidation Bureau for claims to Great Atlantic Insurance (3.8); perform legal research re: claims to New York Liquidation Bureau for claims to insolvent insurer (.5); review and analyze Great Atlantic Insurance policy (.2); review and analyze six complaints for allegations that implicate and trigger Great Atlantic Insurance policy period for notice of claims (1.6).	6.90	4,940.40
S. D. Greenspan	10/09/22	Correspondence with P. He re: preparation of NYLB tender letter under Great Atlantic policy.	2.20	2,197.80
P. He	10/09/22	Correspondence with S. Greenspan re: tender to New York Liquidation Bureau for claim to Great Atlantic Insurance (.4); review, prepare and finalize letter to New York Liquidation Bureau for claim to Great Atlantic Insurance with complaints attached (1.3).	1.70	1,217.20
S. Korchinski	10/09/22	Finalize Great Atlantic notice letter and draft request for ftp for transmission of materials associated with same.	0.20	80.00
S. D. Greenspan	10/10/22	Correspondence with P. He re: preparation and finalizing the tender to the NYLB (.2); revise letter to Security Mutual Insurance Company submitting secondary evidence, requesting that SMIC rescind its disclaimer and informing it of the court-ordered mediation and prepare email to SMIC re: same (.9)	1.10	1,098.90

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P. He	10/10/22	Research and analyze Arrowpoint Capital's acquisition of Empire Insurance as successor in interest of Security Mutual for possible insurance coverage (.6); telephone conference with M. Pierro of Insurance Archeology Group re: Arrowpoint Capital (.2); communicate with A. Iniguez re: correspondence from insurers and exchange of information and documents (.2); communicate with S. Greenspan re: tender to New York Liquidation Bureau for claim to Great Atlantic Insurance, strategy for Security Mutual Insurance Company's reconsideration and secondary evidence proof of insurance policy, response and update to Jefferson Insurance Company (.4); draft letter to New York Liquidation Bureau for claim to Great Atlantic Insurance (.6); draft and input on letter to Security Mutual Insurance Company re: secondary evidence and request for reconsideration (2.7); draft and revise response letter to Jefferson Insurance Company re: reimbursement of invoices, mediation, responses to RFI, and updates (4.1); communicate with B. Baker of Friedman Kaplan re: responses to Jefferson Insurance Company's RFI and Madison's documents (.2); review and analyze INA umbrella policy (.2).	9.20	6,587.20

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S. D. Greenspan	10/11/22	Correspondence with B. Baker and P. He re: responding to Jefferson's/Allianz's RFIs (.4); review draft letter to Jefferson/Allianz responding to its acceptance letter (.3); correspondence with P. He re: questions and suggested revisions to same (.4); review letter and email from Security Mutual Insurance Company reiterating its denial of coverage (.2); correspondence with PW team, B. Baker, Pillsbury team and IAG re: same (.2); locate email address for priority Swiss Re claims correspondence to send the mediation letter and correspondence with P. He re: sending out a copy of the Swiss Re tender to the Swiss Re priority email box (.2); correspondence with B. Baker re: preparing appeal to Chubb of Alan Gray reductions (.2).	1.90	1,898.10

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P. He	10/11/22	Correspondence with S. Greenspan re: CGL policies coverage chart defense invoices for reimbursement, letter response to RFI and update to Jefferson Insurance Company, strategy to oppose Alan Gray deductions and Chubb's unilateral imposition of billing guidelines, letter to insurers re: mediation, insurers' responses to Madison's tenders, strategy to request reconsideration of coverage from AIG on behalf of National Union Fire Insurance Co of Pittsburgh PA (.4); input, revise, and finalize letter to insurers re: mediation, bankruptcy, and insurers' responses to Madison's tenders (2.1); communicate with B. Baker of Friedman Kaplan re: responses to Jefferson Insurance Company's RFI, Madison's documents, appeal of Alan Gray deductions to Chubb reimbursement (.6); review Friedman Kaplan's appeal of Alan Gray deductions to Chubb reimbursement (.2); review and analyze tenders to and coverage correspondence from Jefferson Insurance Company for complaints triggering policy (1.6); review case and settlement demands chart from Friedman Kaplan to analyze allegations of bad acts from complaints triggering coverage for certain policy periods (.4); prepare notice letter and complaints to Swiss Re re: tender to Puritan Insurance Company (.3); correspondence with Swiss Re re: tender to Puritan Insurance Company (.2); further revise letter to Jefferson Insurance Company re: response to RFI with input from Friedman Kaplan, status of tenders and insurers' responses, reimbursement of invoices, and mediation (2.0).	7.80	5,584.80

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S. D. Greenspan	10/12/22	Conference with P. He re: response to Allianz information request letter and re pushback letter in denial of coverage claims that trigger its policy (.3); conferences with B Baker and Pillsbury team re: response to Allianz request for information (.6); conference with P. He re: preparation of coverage correspondence to AIG and Allianz (.2); revise letter to Jefferson/Allianz responding to its letter agreeing to defend under a reservation of rights (.6); correspondence with P. He re: same (.2) correspondence with B. Baker re: settlement of three underlying claims and notice to insurers re: same (.2); review summary chart of all 137 claims against Madison (.2); revise letter to Chubb (J. Biondolillo) updating Chubb on the dismissal of three underlying claims against Madison and prepare email to J. Biondolillo re: same (.3).	2.60	2,597.40

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P. He	10/12/22	Conference with S. Greenspan re: response to Allianz information request letter and re pushback letter in denial of coverage claims that trigger its policy (.3); conferences with B. Baker, S. Greenspan and Pillsbury team re: response to Allianz request for information (.2); conference with S. Greenspan re: preparation of coverage correspondence to AIG and Allianz (.2); correspondence with S. Greenspan re: preparation of response to Jefferson/Allianz letter agreeing to defend under reservation of rights (.3); correspondence/conference with Pillsbury team re: policy with Security Mutual and successor in interest and re: Security Mutual Insurance Co.'s response to secondary evidence of policy (.3); review and analyze correspondence from Security Mutual Insurance Co. and formulate strategy for response (.2); review, revise, and finalize letter to Jefferson Insurance Company re: reimbursement of invoices, status of tenders and insurers' responses, and request for information (2.0); communicate with B. Baker of Friedman Kaplan re: Liguori discontinuance of certain plaintiffs (.2); draft letter to J. Biondolillo re: claim update of Liguori action and reimbursement of defense costs (.4); review Friedman Kaplan's case and settlement demand chart and stipulation of discontinuance with prejudice (.4); review and analyze Alan Gray reports and appeal from Friedman Kaplan (.4); draft letter to J. Biondolillo re: appeal of Friedman Kaplan invoices, Alan Gray reports, demand for reimbursement and duty to defend (1.4).	6.30	4,510.80

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S. D. Greenspan	10/13/22	Revise letter to Chubb forwarding FK appeal to Alan Gray fee reduction, demanding payment of full hourly rates and cessation of use of Chubb litigation guidelines and addressing numerous defense costs and consequential damages issues (1.6); correspondence with P. He re: same (.3); correspondence with PW team, J. Jean and B. Baker re: actions taken by Chubb that contributed to Madison's filing for Chapter 11 reorganization in connection with preparation of pushback letter to Chubb on its reduction of defense counsel fees (.4); review documents re: dates of earlier tender by Madison of the CVA Claims to the carriers (in connection with demand for defense costs going back to the first date of tender) (.3); correspondence with P. He re: same (.2); correspondence with B. Baker re: demanding that other insurers pay for Madison's affirmative claims against Rockefeller University (.2); correspondence with P. He: re: locating letter by Chubb's counsel claiming inability to locate additional Chubb policies (.2); review and analyze letter from Chubb's counsel re: its inability to locate any additional Chubb policies and Chubb's subsequent letter locating additional policies (in connection with preparation of pushback letter to Chubb (.3); review timelines of requests for policy documents from Chubb and responses by Chubb's counsel (.2); review New York caselaw re: allocation (.3); correspondence with P. He re: same (.2); correspondence/confer with J. Jean re: increasing Chubb percentage share of payment for affirmative claims against Rockefeller given its larger share of the risk and re: insurers' liability to Madison for interest (.3).	4.50	4,495.50

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	10/13/22	Correspondence and confer with Pillsbury team re: actions taken by Chubb that contributed to Madison's filing for Chapter 11 reorganization in connection with preparation of pushback letter to Chubb on its reduction of counsel fees, consequential damages, duty to defend (.4); correspondence with Pillsbury team re: coverage strategy, appeal of Friedman Kaplan invoices to Chubb, defense costs, rejecting Chubb's litigation management guidelines and affirmative claims for contribution (.4); review and revise letter and prepare exhibits to Chubb re: Friedman Kaplan appeal to Chubb, demand for reimbursement, status of re-tenders based on recently discovered policies, and duty to defend (2.9); review communication from M. Sitzler for MIC Motors Insurance Corp. re: disclaimer of coverage (.2); conferences with S. Greenspan re: Friedman Kaplan invoices, defense rates, reasonableness of defense fees and costs, Alan Gray deductions, arguments for duty to defend, and strategy to demand reimbursement at full rates (.9) correspond with S. Greenspan re: history of tender of claims to insurers, analysis of Chubb's deductions and unilateral imposition of defense rates (.7); correspondence with S. Greenspan re: Alan Gray deductions, appeal of Friedman Kaplan invoices and recovery of defense fees at full rates (.6); perform further legal research re: reasonableness of defense attorneys' fees and costs (1.2); draft memo re: reasonableness of defense attorneys' fees and costs (.5); prepare history of tender of claims to insurers and review of notices to insurers (.5); prepare chart of calculations, deductions, and defense costs for defense cost reimbursement dispute with Chubb (.8); correspond with A. Iniguez re: calculations of Alan Gray deductions and amounts owed by Chubb (.3); conference with A. Iniguez re:	13.10	9,379.60

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		Chubb's reimbursement of defense costs and correspondence between Madison and Chubb re: search for missing policies and evidence of policies (.3); review and analyze insurance policies for policy language applicable to trigger analysis (1.9); draft analysis re: policy language applicable to same (.7); review and analyze correspondence re: request and searches for additional Federal and INA policies, along with primary and secondary evidence of policies (.5); draft timeline of correspondences re: request for Federal's policies and providing secondary evidence of policies existence to Federal (.3).		

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S. D. Greenspan	10/14/22	Conference with K. Woodcock re: research assignment under New York law re: reasonableness of defense counsel fees vs. panel counsel rates (.2); review correspondence from K. Woodcock re: results of her research (.2); review correspondence from P. He re: results of New York law research re: allocation issue (.7); correspondence with P. He re: preparation of response to Gen Re (North Star RFIs (.2); draft summary of New York caselaw on rejection of insurance panel counsel rates as the measure of reasonableness (.7); correspondence with J. Jean re: research assignment re: recoverability of consequential damages against insurers in NY under Bi-Economy and Panasia (.2); review and analyze AIG's latest production of documents (2.3); correspondence with Pillsbury team summarizing AIG production (.3); correspondence with PW team re: deficiencies in the AIG production (.2); prepare email to AIG's coverage counsel re: deficiencies in AIG's production and other outstanding issues (.6); follow up correspondence to and from AIG's coverage counsel N. Valenza-Frost (.3); prepare memo to K. Woodcock re: research assignment for recoverability of consequential damages against insurers in NY under Bi-Economy and Panasia and factual basis for claim (.8); correspondence with B. Coffey and M. Pierro re: assignment to review the new AIG production and check against the coverage chart (.3); review and analyze Federal (Chubb) new coverage position letter it has agreed to defend Madison with respect to 36 of the claims/lawsuits under the 70-71 and 73-74 CGL policies (.4); correspondence with B. Baker and P. He re: submission of FK invoices going back to the tender date for all lawsuits Chubb agreed to tender (.2); correspondence with	9.80	9,790.20

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		J. Jean re: Chubb's new coverage position letter (.2); correspondence with A. Iniguez re: process of verification of Chubb's trigger analysis in deciding which plaintiffs' complaints it would defend (.4); correspondence with J. Biondolillo requesting that he direct future coverage correspondence to me as we requested and re: review of the draft Joint Agreement (.6); review letter from the NYLB rejecting the tender due to the closing of the ancillary estate of Great Atlantic and review Closing Order and correspondence re: Pillsbury team re: same (.2); prepare report to PW team, J. Dold and B. Baker re: summary of all insurer correspondence from today (.8)		

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P. He	10/14/22	Perform legal research re: New York supporting authority in support of reasonableness of defense fees and cost, defense costs of CVA actions (2.7); correspond with S. Greenspan re: strategy to respond to insurers to dispute coverage disclaimers and to invoke coverage (.3); correspond with S. Greenspan re: response strategy to AIG's supplemental coverage position letter, AIG's document production, additional policies identified (.4); correspond with S. Greenspan re: responding to insurers for coverage request, strategy to respond to North Star Reinsurance and Gen Re's request for information (.3); correspond with S. Greenspan re: strategy to respond to Chubb for insufficient evidence, analysis of Federal's coverage and responses to tenders supporting authorities for reasonable standard of defense costs and insurers obligation to pay under a duty to defend, analysis, and procedural history re: reasonableness of defense fees and cost of CVA actions (1.8); correspondence with K. Woodcock re: legal research and analysis of reasonableness of defense fees and costs under New York law (.4); correspondence with S. Greenspan and B. Baker of Friedman Kaplan re: Federal's agreement to defend additional claims and strategy for reimbursement of defense costs for claims previously tendered (.3); review and analyze Chubb's coverage position letter re: Federal's pre-1977 policies, additional agreement to defend claims previously tendered, request for information, Century's policies, and coverage analysis to ensure accuracy and strategy to respond for reimbursement for recovery of defense costs and fees (3); review communications from New York Liquidation Bureau re: order and judgment closing Great Atlantic Insurance, and inability of recovery from Great Atlantic Insurance (.3); review	7.80	5,584.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
		communications from S. Greenspan and J. Jean re: strategy for recovery from Great Atlantic Insurance, AIG's supplemental coverage letter and evidence of umbrella policies (.4); review correspondence from SiriusPoint re: coverage disclaimer and lacking policy evidence (.2); correspond with A. Iniguez re: strategy to review Federal's coverage position letters to ensure accuracy of Chubb's analysis (.4).		
S. Korchinski	10/14/22	Review AIG document production received from Carlton Fields; circulate same to B. Coffey and IAG.	0.90	360.00
S. D. Greenspan	10/15/22	Correspondence with A. Iniguez and P. He re: process of verification of Chubb's trigger analysis in deciding which plaintiffs' complaints it would defend (.6); analyze prior tenders to Chubb and correspondence with P. He re: same in regard to preparation of future coverage correspondence (1.6); correspondence with P. He re: strategy for coverage correspondence re: 71-74 CGL policy and re: Diaz and J.L. cases, including review of documents relating to same (.9); review updated list of CVA plaintiffs (.2).	3.30	3,296.70

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	10/15/22	Review and analyze Chubb's supplemental coverage position letter (.8); review and analyze tenders to Chubb, CVA complaints, and Chubb coverage position letters to ensure accuracy and proper application of coverage (3.8) draft summary of analysis of coverage positions, applicable policy periods, and allegations of abuse to trigger coverage (.2); correspondence with S. Greenspan re: strategy to seek reimbursement from Chubb for defense costs, additional coverage of lawsuits under Chubb policies and Chubb's failure to satisfy duty to defend (.7); correspond with S. Greenspan re: status of Federal's coverage analysis, policies triggering coverage, Madison's tenders to insurers and coverage positions (.4); correspondence with S. Greenspan re: strategy to respond to AIG's disclaimer and request for documents (.4); correspondence with A. Iniguez re: strategy to review Chubb's coverage position letter ensure accuracy of CVA lawsuits triggering coverage under accepted policies and AIG's coverage positions of CVA actions (.2); review and analyze AIG coverage position letters to prepare response for rebuttal, request reconsideration, and search of policies and evidence of policies (1.2); draft letter to AIG re: response to AIG's coverage positions, rebuttal of AIG's reasoning, request reconsideration, and search of policies and evidence of policies (5.7).	13.40	9,594.40
A. Iniguez	10/15/22	Confirm list of cases not previously tendered to Chubb within the 11/1/77 to 11/1/79 time period (1.5); correspondence with P. He re: same (.2).	1.70	651.10

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S. D. Greenspan	10/16/22	Review and revise draft letter to AIG claims handler and coverage counsel responding to AIG's latest coverage positions letters on numerous coverage issues and review underlying complaints, insurance policies, tender letters and coverage position letters in connection with same (2.3); correspondence with P. He re: review of/revisions to draft pushback letter to AIG claims handler and coverage counsel and re: strategy for same/arguments for same and against other carriers (.6); correspondence with B. Baker re: responding to Jefferson/Allianz RFIs (.2); strategize re: same (.2).	3.30	3,296.70
P. He	10/16/22	Review and analyze insurers' obligation under New York State Department of Financial Services to produce policy-related information and complete document productions in support of Madison's demand for policy evidence and coverage (.4); correspondence with S. Greenspan re: strategies to respond to Gen Re's requests for information, seek reimbursement of affirmative claims from Jefferson, response to Jefferson's RFI with status of insurers' responses, and respond to AIG's coverage positions, reconsideration of disclaimer, demand coverage and defense, and request for policy documents, demand for Chubb's increased contributions and dispute of defense costs and fees (.3); correspondence with Swiss Re re: tender of claims (.2); review and analyze multiple AIG coverage position letters to prepare response for rebuttal, request reconsideration, and search of policies and evidence of policies (2.6); review and revise letter to AIG re: response to AIG's coverage positions, rebuttal of AIG's reasoning, demand coverage and reimbursement, and search of policies and evidence of policies (2.2).	5.70	4,081.20

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S. D. Greenspan	10/17/22	Correspondence with P. He re: strategy for Chubb bad faith letter (.3); review correspondence with Swiss Re: tender of claims (.2); correspondence with P. He re: tracking coverage position letters and responses (.2); correspondence with B. Baker re: Jefferson agreement to defend cases and gathering, submission of information about those cases to Jefferson and re: scheduling conference re: same (.2); revise draft letter to AIG's coverage counsel responding to its coverage position letter and correspondence with P. He and B. Fleishman re: same (.7); correspondence to P. He and B. Fleishman re: lack of consent by Friedman Kaplan or Madison to Chubb Litigation Guidelines (.2); correspondence with B. Fleishman re: response to Jefferson's requests for information (.2); correspondence from M. Bergman of AIG re: her assumption of the file (.2); conference with B. Baker and P. He re: response to Jefferson's Requests for Information, Chubb's agreement to defend new cases and re: Rockefeller affirmative claim (1.4); review revised coverage chart (.2); correspondence with P. He: preparation of coverage correspondence to Chubb re: trigger analysis corrections (.2); correspondence with B. Baker and L. Varga re: cancellation of status call (.2); confer with J. Jean re: Bi-Economy and Papasia line of cases and consequential damages research re: defense costs and forcing into bankruptcy (.8); confer with J. Jean re: demands on Chubb and responses to L. Klein (.4); confer and emails with J. Jean re: denials of coverage and availability of policy evidence (.8).	6.20	6,193.80

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P. He	10/17/22	Correspondence with Pillsbury team re: strategy to request reconsideration of AIG's coverage position and demand for coverage under specific AIG policies (.2); correspond with Pillsbury team re: strategy to provide documents and information responsive to Jefferson's information request (.3); correspondence with B. Baker of Friedman Kaplan re: updating insurers with status of defending underlying CVA actions and strategy to respond to insurers' inquiries (.3); conference call with B. Baker of Friedman Kaplan and S. Greenspan re: strategy to respond to Jefferson's RFI and seek contribution for affirmative claim, Chubb's agreement to defend additional cases and seek reimbursement (.9); correspondence with S. Greenspan re: Security Mutual's coverage positions and analysis of evidence of AIG policies (.3); correspondence with S. Greenspan re: strategy and arguments to dispute Chubb's billing guidelines, implied agreements between Chubb and Madison and relevant law for duty to defend (.4); correspondence with A. Iniguez re: compiling necessary information to respond to inquiries from Gen Re and AIG coverage position letters (.3); correspondence with A. Iniguez re: strategy to review Chubb's coverage position for accuracy and ensure coverage of CVA Actions triggered under certain policies (.6); review and analyze AIG coverage position letters to prepare response for rebuttal, request reconsideration, and search of policies and evidence of policies (.8); revise letter to AIG re: response to AIG's coverage positions, rebuttal of AIG's reasoning, demand coverage and reimbursement, and search of policies and evidence of policies (1.1).	5.20	3,723.20
S. Korchinski	10/17/22	Review recent correspondence for draft non-disclosure agreement.	0.20	80.00

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B. J. Coffey	10/18/22	Summarize new additions to coverage chart and correspondence with S. Greenspan re: same (.2); gather secondary evidence of AIG policies to provide to AIG and correspondence with S. Greenspan and P. He re: same (1.2); gather evidence of new policies for notice letter (.4).	1.80	842.40

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S. D. Greenspan	10/18/22	Correspondence with B. Fleishman re: draft letter to AIG's coverage counsel responding to AIG's coverage position letter (.2); correspondence to PW team re: AIG's production of new secondary evidence of insurance policies and re: further production of same and re: strategy in connection with same (.4); correspondence with B. Coffey, S. Korchinski and M. Pierro re: gathering and producing secondary evidence of AIG policies to produce to AIG (.2); correspondence with N. Valenza-Frost re: Madison's production of documentation re: AIG policies issued to Madison (.2); correspondence with B. Coffey re: differences between revised coverage chart and prior version and review differences (.2); review New York law re: recoverability of consequential damages against insurers for bad faith and correspondence with B. Fleishman re: same (.2); correspondence with K. Woodcock re: research assignment re: assignability of certain claims against insurers under New York (.2); review and analyze result of assignability research (.3); revise letter to AIG demanding that it reconsider its coverage positions and provide a defense under the 1984-85 American Home primary policy and provide coverage under the 1983 National Union umbrella policy (.3); correspondence with B. Coffey and P. He re: new insurers/policies to provide notice/tender claims under and re: comparison of revised coverage chart to prior chart (.8); correspondence with P. He re: status of preparation of insurer correspondence (.2); correspondence to Pillsbury team re: revised coverage chart and differences between revised chart and prior version (.3); correspondence with B. Baker re: proposed production to Jefferson (.2); conference with J. Jean re: claims against insurers and assignability (.4);	4.70	4,695.30

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
		conference with J. Jean re: Bi-Economy and Panasia line of cases (.6).		
P. He	10/18/22	Correspondence with S. Greenspan and B. Coffey re: insurer coverage charts and evidence of policies (.3); correspondence with S. Greenspan and B. Coffey re: strategy for submission of new tenders of CVA Actions under newly discovered policies to Mount Vernon, Puritan and National Union (.4); review and analyze evidence of policies (.2) strategize tenders of claims to insurers Mount Vernon, Puritan, and National Union (.3); research insurers for tenders (.2); correspondence with A. Iniguez re: tendering claims to Mount Vernon, Puritan and National Union under newfound policies and compilation of complaints for tender (.4); draft letter to Chubb re: reimbursement of defense costs, duty to defend, search for policies, and demand for coverage (.7).	2.50	1,790.00
A. Iniguez	10/18/22	Review all 87 complaints for all plaintiffs dates of alleged abuse in connection with verifying correct trigger dates and correspondence with P. He re: same (1.7); prepare folders of complaints for tendering to National Union Fire Insurance Company of Pittsburgh, PA (3/3/77-11/1/1977), Mount Vernon Fire Insurance Company (11/77-3/1/1979) and Puritan Insurance Company (11/1/1979 - 11/1/1980) (.9).	2.60	995.80
S. Korchinski	10/18/22	Review document collection for term sheet transmittal to insurers (.6); prepare document production of secondary evidence of AIG policies (1.3).	1.90	760.00
B. J. Coffey	10/19/22	Conference with M. Pierro of IAG re: redesign of coverage chart based on new evidence from AIG.	0.20	93.60

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P. He	10/19/22	Communications with B. Baker of Friedman Kaplan re: responses to Jefferson's RFI, Chubb's RFI of underlying litigation and discovery (.4); correspondence with S. Greenspan re: strategy to prepare response to Chubb's supplemental coverage position letter (.3); correspondence with S. Greenspan re: preparation of bad faith letter against Chubb for breaching duty to defend reconsideration of coverage and demands to take corrective measures (.5); draft letter to Chubb re: reimbursement of defense costs, Chubb's failure to meet its duty to defend, search for policies, improper billing guidelines and rate reductions, and demand for coverage (5.8); review and analyze correspondence between Pillsbury and Chubb re: Chubb's imposition of defense rates for underlying CVA actions and billing guidelines (.3); review report re: abuse (.2); review case analysis re: duty to defend extends to payment of the policyholder's reasonable fees and defense costs (.3); perform legal research re: providing defense and reasonableness defense cost as part of duty to defend and when the duty to defend discharges, consequential damages and extra-contractual damages, reasonableness of defense costs (1.5); review and analyze invoices for appeal to Chubb (.2).	9.50	6,802.00
B. J. Coffey	10/20/22	Conference with M. Pierro of IAG re: comparison of insurance evidence provided by AIG and status of requests for additional information sent to New York DFS (.4); correspondence with P. He re: Puritan and AIG tenders (.3).	0.70	327.60

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S. D. Greenspan	10/20/22	Telephone conference with P. He re: revisions to Chubb letter concerning defense obligations (.8); telephone conference with B. Baker re: revisions to correspondence re: report (.2); conference with Bonnie Baker re: disclosure of report and re: privilege issues (.2); review all Madison documents in the proposed production to Jefferson (1.2); conference with B. Baker re: same and needed redactions to same (.3); correspondence with Pillsbury team re: same (.2); correspondence with B. Baker re: scheduling conference re: report production request (.2); correspondence with B. Coffey and P. He re: AIG production of secondary evidence (.2); correspondence with J. Jean and B. Fleishman re: response to Chubb's request for production of the report (.6); revise draft letter to Chubb re: bad faith, liability to Madison for consequential damage, breach of the duty to defend, demand for payment of all defense costs, demand for full payment of full hourly rates of defense counsel and cessation of applications of Chubb Litigation Guidelines and Alan Gray Audits, appeal of Alan Gray reductions and clarification of trigger dates (1.9); correspondence with B. Baker and P. He re: tender of CVA Actions to newly discovered insurers (.2); correspondence with P. He re: response to Jefferson RFIs (.2).	6.20	6,193.80

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P. He	10/20/22	Correspondence with B. Baker of Friedman Kaplan re: disclosure of report and privilege issues of report, providing Jefferson Insurance with responses containing information and responsive documents to Jefferson's request for information (.3); correspondence with B. Baker of Friedman Kaplan re: tender of CVA Actions for newly discovered insurance policies and the status of the amended complaint for CVA Action filed by TB to analyze policy implications (.5); telephone conference with S. Greenspan re revisions to Chubb letter concerning defense obligations (.8); correspondence with S. Greenspan re: providing Jefferson Insurance with responsive documents to Jefferson's request for information (.3); correspondence with B. Coffey re: strategy to tender complaints under Puritan Insurance Company policies and AIG umbrella policies (.3); draft letter to Chubb re: conflict of interest, reimbursement of defense costs, Chubb's failure to meet its duty to defend, improper billing guidelines and rate reductions, demand to withdraw billing guidelines, auditors, and panel rates (2.0); perform legal research re: limitations to insurers participation in defense of insured, independent counsel's role and judgment, conflict of interest, ethics opinions re: duty to defend, reasonableness of defense costs (.4); correspondence with A. Iniguez re: tender of CVA Actions to Puritan Insurance Company (.2); draft correspondence to Puritan Insurance Company to tender 18 complaints with evidence of policy, analysis of allegations of sexual abuse, demand for indemnity and a defense, bankruptcy status, and mediation update (4.8); review and analyze 18 complaints for tender to Puritan Insurance Company (1.3).	10.90	7,804.40

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S. D. Greenspan	10/21/22	Correspondence with B. Baker re: proposed production of documents to Jefferson and redactions to same (.2); correspondence with PW team re: status of settlement negotiations with the Committee and re: insurer consultations (.4); correspondence with B. Baker and P. He re: tender of CVA Actions to newly discovered insurers (.4); revise/finalize tender letter to Puritan Insurance Company and correspondence with P. He re: same (.4); review/revise research memo re: availability of consequential damages for breach of the duty to defend and correspondence with K. Woodcock re: same (in connection with preparation of Chubb bad faith letter) (.9); prepare/outline bad faith arguments of Madison against Chubb in connection with preparation of bad faith letter (2.2); correspondence with P. He re: same (.2).	4.70	4,695.30

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P. He	10/21/22	Review and analyze secondary evidence of policies issued by Mount Vernon and National Union (.4); review and analyze CVA Action complaints to determine whether the complaint is triggered under specific years of Mount Vernon and National Union excess policies (2.1); review communications from S. Greenspan and K. Woodcock re: bad faith and consequential damages arising from breach of duty to defend (.4); correspondence with S. Greenspan re: tender of complaints to Puritan Insurance Company based on new evidence of policies (.2); correspondence with S. Greenspan re: strategy for bad faith letter to respond to Chubb for actions giving rise to bad faith and consequential damages from its breach of duty to defend (.4); correspond with B. Baker of Friedman Kaplan re: status of CVA Actions filed by TB, Liguori and Cusumano (.2); correspond with B. Baker of Friedman Kaplan re: documents from defense of CVA Action responsive to Jefferson's request for information (.3); revise tender letter to Puritan Insurance Company (.4); correspond with A. Iniguez re: strategy to prepare tender of CVA Action complaints to Puritan Insurance Company (.4); review legal research and analysis of case authorities in support of bad faith and consequential damages arising from breach of duty to defend (.4); draft letter to Chubb re: breach of duty to defend, Federal's conditions to defend Madison, and refute Chubb's imposition of rates and guidelines consistent with Chubb's failure to meet its duty to defend (2.2).	7.40	5,298.40
A. Iniguez	10/21/22	Prepare final tender letter to Puritan Insurance with attachments in PDF format for emailing to insurer and correspondence with P. He in connection with same (.3); prepare copy of same for certified mail (.2).	0.50	191.50

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P. He	10/22/22	Perform legal research for and analysis of authority of bad faith and consequential damages arising from breach of duty to defend (.7); strategize instances of bad faith and acts that constitute the breach of Chubb's duty to defend for support of prejudice and consequential damages recoverable by Madison in demands to Chubb (1.8); draft letter to Chubb re: breach of duty to defend, Federal's conditions to defend Madison, refute Chubb's imposition of rates and guidelines, and multiple demands for defense and recovery of insurance benefits (7.6); correspondence with S. Greenspan re: strategy to demand Chubb to Chubb re: breach of duty to defend, Federal's conditions to defend Madison, refute Chubb's imposition of rates and guidelines, and multiple demands for defense and recovery of insurance benefits (.2).	10.30	7,374.80
P. He	10/23/22	Perform research and analysis re: identifying proper entity for tender of complaints under secondary evidence of Mount Vernon policies, and claims process for Mount Vernon Fire Insurance Company, Mount Vernon Specialty Insurance Company, and United States Liability Insurance Company (.4); draft correspondence to Mount Vernon Insurance to tender 18 complaints with evidence of policies, analysis of allegations of sexual abuse, demand for indemnity and a defense, bankruptcy status, and mediation update (2.7); draft correspondence to National Union Insurance to tender 14 complaints with evidence of policy, analysis of allegations of sexual abuse, demand for indemnity and a defense (1.6).	4.70	3,365.20

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S. D. Greenspan	10/24/22	Correspondence with B. Baker and with Pillsbury team re: proposed production to Jefferson (.4); correspondence with J. Jean re: submission to Chubb of all FK invoices and demand that it pay them and strategize re: same (.3); correspondence with B. Baker re: request for all FK invoices (.2); conference with B. Fleishman re: same (.2); correspondence with B. Coffey and P. He re: tender to Mt. Vernon (.2); correspondence with PW team re: providing AIG access to abuse proofs of claim (.2); revise draft tender letter to Mt. Vernon (USLI) and correspondence with P. He re: same (.8); correspondence with J. Jean and B. Fleishman re: redaction of pre-petition defense counsel invoices prior to production to preserve privilege of attorney-client communications (.4); correspondence with B. Baker, J. Jean and B. Fleishman re: Allianz/Jefferson's request for information re: pre-CVA settlements (.7); correspondence with M. Levi re: Committee's Rule 2004 subpoenas of the insurers (.2).	3.60	3,596.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	10/24/22	Analyze Mount Vernon Insurance as target policies for insurance recovery and tender of CVA Actions (.2); correspondence with S. Greenspan re: strategy for demands to newly found insurers for coverage and participation of defense (.2); correspondence with S. Greenspan re: strategy to inform Jefferson Insurance of status updates to updates from insurers and responses to Jefferson's request for information, demand reimbursement of defense costs, submission of Friedman Kaplan invoices, production of documents responsive to Jefferson's requests (.5); correspondence with A. Iniguez re: preparing document production to Jefferson Insurance responsive to Jefferson's request for information (.4); communicate with B. Baker of Friedman Kaplan re: settlements of pre-CVA Actions, CVA Actions, and document production responsive to RFI, and defense costs and invoices for recovery from insurers (.5); strategize document production to Jefferson Insurance responsive to RFIs (.7); correspondence with Pillsbury team re: strategy for recovery of defense costs, disclosure of Friedman Kaplan invoices to insurers under a reservation of rights and subject to joint interest and confidentiality agreements, privilege concerns relating to Friedman Kaplan invoices, strategy re: informing insurers of settlements of sexual abuse claims not filed as a CVA Action and settlement of CVA Actions (.5); review Friedman Kaplan's report re: sexual abuse allegations and settlements (.2); draft tender of claims to Mount Vernon Fire Insurance Company (.2); phone call to United States Liability Insurance Company re: agent for service of process for Mount Vernon Fire Insurance Company and process to tender claims (.2); revise letter to Chubb re: duty to defend,	7.10	5,083.60

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		reimbursement demands, breach of duties, and consequential damages (.3); draft letter to Jefferson re: an update of Madison's tenders and responses to RFIs (3.2).		
A. Iniguez	10/24/22	Download documents from Friedman Kaplan for production to Jefferson and correspondence with P. He re: same (.2); emails re: conversion of TIF documents to PDF for production (.2).	0.40	153.20
S. D. Greenspan	10/25/22	Correspondence with B. Baker and L. Varga re: cancellation of status call (.2); revise revised bad faith letter to Chubb and further revise same (1.2); correspondence with J. Jean and B. Fleishman re: Allianz/Jefferson's request for information re: pre-CVA settlements (.2); review correspondence from A. Kornberg to M. Plevin requesting Chubb's preferred language concerning the assignment of rights to insurance proceeds (.2); review draft letter to Jefferson re: tender updates and responses to RFIs and revise same and correspondence with B. Coffey and P. He re: same (2.1); review draft status report on the underlying actions and correspondence with B. Baker re: same (.4); correspondence with J. Jean and B. Fleishman re: scope of production to Jefferson in response to its RFIs and strategy re: same (.6); correspondence with M. Levi re: disclosure obligations re: marketing of Navy Yard (.2); review the Committee's Rule 2004 subpoenas to Insurers (.3); revise tender letter to National Union under newly discovered policies and correspondence with P. He re: same (.4); review correspondence from counsel for Allianz/Jefferson refusing to consent to settlement and correspondence re: same (.4); revise/finalize draft tender letter to Mt. Vernon (USLI) and correspond with P. He re: same (.3); correspondence with M. Levi re: confidentiality issues (.2).	6.70	6,693.30

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P. He	10/25/22	Revise and finalize letter to Jefferson re: response to coverage letter, status of tenders, and responses to RFI (1.7); revise and finalize tender to Mount Vernon Fire Insurance Company (.8); revise and finalize tender to AIG re: National Union Excess policies for defense and coverage (.4); strategize document production to Jefferson in response to RFI (.4); strategize re: newly identified policies and identify CVA Actions implicated under certain policies by evaluating alleged years of abuse under certain policy periods (.3); review communications from B. Baker of Friedman Kaplan re: responses to Jefferson's RFI (.3); correspondence with A. Iniguez re: preparing document production to Jefferson in response to its request for information (.2); correspondence with Pillsbury team re: strategy to respond to Jefferson's request for information (.4); correspondence with Pillsbury team re: relevancy and disclosure of settlement information of non-CVA cases (.3); correspondence with S. Greenspan re: strategy for coverage and recovery, strategy for tenders to Mount Vernon and AIG, response letter to Jefferson re: coverage, status of tenders, and RFIs (.7).	5.50	3,938.00
A. Iniguez	10/25/22	Upload document production to SFTP site and correspondence with P. He re: document production.	0.30	114.90
S. Korchinski	10/25/22	Revise document collection to include recent correspondence.	1.40	560.00

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S. D. Greenspan	10/26/22	Review and analyze correspondence from Mt. Vernon/USLI responding to Madison's tender letter and requesting information and strategize re: response (.4); correspondence with P. He re: preparation of response to same and re: redactions by AIG of certain secondary evidence it produced that USLI demands be removed (.3); correspondence with P. He: search for non-cumulation provisions in policies (.2).	0.90	899.10
P. He	10/26/22	Review and analyze communication from E. Hynes of USLI re: response to Madison's tender of claims to Mount Vernon Insurance (.3); strategize response to USLI re: Madison's tender to Mount Vernon, identification of policies, and insurers' responses to Madison's various tenders (.4); correspondence with S. Greenspan re: strategy to respond to USLI's inquiries (.4); correspond with S. Greenspan re: analysis of insurers' policies to evaluate non-cumulation clauses (.3); draft response letter to USLI re: USLI's response to Madison's tender of claims to Mount Vernon Insurance, inquiries, and coverage (3.3); review and analyze multiple CGL primary and excess policies for non-cumulation clauses and provisions preclude stacking limits (2.1).	6.80	4,868.80
S. Korchinski	10/26/22	Revise document collection to include recent correspondence.	5.30	2,120.00

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S. D. Greenspan	10/27/22	Revise/finalize letter to Mt. Vernon/USLI responding to its acknowledgment letter and its request for information and correspondence with P. He re: same (1.6); correspondence with P. He re: alternative names for Madison, if any, in connection with responding to Mt. Vernon/USLI's request for information and revise email to J. Dold re: same (.4); voicemail from E. Hynes of USLI and correspondence with P. He re: need to respond to E. Hynes' call re: settlement monitoring (.2); review correspondence from Swiss Re (Westport) responding to Madison's and correspondence with P. He re: preparation of response (.2); correspondence with P. He re: results of his call with the Mt. Vernon/USLA claim handler (.2).	2.60	2,597.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	10/27/22	Revise and finalize letter to USLI re: responses to inquiries, coverage, search for policies, status of Madison's insolvency, and evidence of policies, with joint interest and confidentiality agreement, and court order (4.6); phone call with E. Hynes of USLI re: tender, USLI's policy search efforts, inquiries, and Mount Vernon policy (.4); review communication from B. Quadrino of Swiss Re: tender of claims to Westport for coverage under Puritan Insurance policies (.2); correspondence with S. Greenspan re: strategy to prepare letter to USLI re: efforts to search for policies, policy investigation and responding to USLI's inquiries (.5); correspondence with S. Greenspan re: strategy to respond to Westport's acknowledgment of claim and further investigation of policies (.2); strategize response to Westport re: tender to Puritan Insurance, Madison's entity names and alter egos, and policy investigation (.5); prepare correspondence communication to J. Dold of Madison re: status of tender to insurers, newly discovered policies and insurers, policy investigation, request for entity names and alter egos of Madison (1.0).	7.40	5,298.40

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S. D. Greenspan	10/28/22	Review K. Woodcock revisions to Chubb bad faith letter (.4); revise Chubb bad faith letter (2.1); confer with J. Jean re: correspondence with insurers (.4); revise correspondence to J. Dold re: any alternative names for Madison (in connection with preparation of response to USLI/Mount Vernon's request for information (.2); review correspondence from Mount Vernon/USLI acknowledging Madison's latest coverage letter and providing additional policies (.2); correspondence with B. Coffey and P. He re: response to request for other policies from Mount Vernon/USA (.3); correspondence from E. Hynes from USLA re: acknowledgment of Madison's prior coverage letter and prepare response email to same (.6); correspondence with P. He re: SiriusPoint claim (.2); correspondence with B. Fleishman re: protection of Madison's privileges (.2); revise letter to Westport/Puritan response to its coverage letter and correspondence with P. He in connection with same (.2); review correspondence from Mount Vernon/USLI to AIG requesting complete copies of the AIG policies (.2); confer with PW and J. Jean re: settlement strategy (.6).	5.60	5,594.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	10/28/22	Review multiple communications from E. Hynes of USLI re: policies issued to Madison, investigation of coverage, request to AIG for evidence of policies, consultation meeting, joint interest confidentiality and privilege agreement, and response to Madison's response to USLI (.8); review and analyze USLI policies issued to Madison (.2); correspondence with S. Greenspan and B. Coffey re: analysis of USLI policies issued to Madison and identifying proper insurer entity named Mount Vernon (.3); review communications between S. Greenspan to M. Levi of Paul Weiss re: Rule 2004 subpoenas and procedural history (.2); draft letter to Westport Insurance re: Puritan's acknowledgment and investigation of policies and coverage, bankruptcy, and current status of claims (2.9); correspondence with S. Greenspan re: strategy to respond to Westport Insurance re: Puritan Insurance policy and seek coverage (.2); correspondence with S. Greenspan re: strategy to respond to SiriusPoint's coverage position letters and demand SiriusPoint to investigate and search for Security Mutual policies (.2); draft letter to SiriusPoint re: response to and reconsideration of coverage positions, investigation of policy, status of tenders to insurers and insurers' responses, responses to request for information inquiries, exigency and bankruptcy status (5.7).	10.50	7,518.00
A. Iniguez	10/28/22	Update Master Correspondence chart with tender letter to Mount Vernon and response to same (.2); update chart with tender letter to Mary Bergman for National Union Excess (.2).	0.40	153.20

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S. D. Greenspan	10/29/22	Conference and correspondence with K. Woodcock re: revisions to Chubb bad faith letter (.7); correspondence with M. Levi re: history and chronology of the Committee's Rule 2004 discovery of the insurers (.3); revise and finalize letter to Westport/Puritan responding to its coverage letter (.4); revise letter to Sirius Point responding to its disclaimer letter and correspondence with P. He re: same (.8).	2.20	2,197.80
P. He	10/29/22	Revise and finalize letter to SiriusPoint re: response to and reconsideration of coverage positions, investigation of policy, status of tenders to insurers and insurers' responses, responses to request for information inquiries, exigency and bankruptcy status (.9); correspondence with S. Greenspan re: strategy for response to SiriusPoint and Chubb (.3); review communications between M. Levi of PW and S. Greenspan re: Rule 2004 subpoenas, discovery requests, and procedural history (.2).	1.40	1,002.40
S. D. Greenspan	10/30/22	Correspondence with B. Baker re: status of gathering all FK invoices for submission to Chubb (.2); correspondence with K. Woodcock re: additional arguments for Chubb bad faith letter (.2); correspondence with M. Levi re: prior Rule 2004 discovery (.2).	0.60	599.40

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P. He	10/30/22	Review communications from S. Greenspan to B. Baker of Friedman Kaplan re: invoices and reimbursement of defense costs (.2); correspondence with K. Woodcock re: strategy to prepare bad faith letter based on Chubb's representations in its coverage correspondence re: insurer panel rates, limited coverage of complaints, reservation of rights in Chubb's coverage positions which creates a conflict of interest and imposition of litigation management guidelines (1.0); correspond with K. Woodcock re: Pillsbury's previous correspondences communicating Madison's positions re: rebuttal of Chubb's imposition of insurer panel rates, litigation management agreements and guidelines and consistent demands for full defense rates (.6).	1.80	1,288.80
S. D. Greenspan	10/31/22	Correspondence with B. Baker re: status of review and redaction of FK invoices for production to Chubb (.2); correspondence with claims professionals from USLI and AIG re: production of AIG secondary evidence to USLI (.2).	0.40	399.60

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P. He	10/31/22	Review communications from M. Bergman of AIG re: exchange of policy evidence (.2); review communications from E. Hynes of USLI re: producing policy evidence to AIG (.2); analyze document production of underlying insurers AIG and Jefferson Insurance Company's policies and coverage correspondence responsive to Gen Re's request for information (1.5); correspondence with A. Iniguez re: strategy for preparing document production of Jefferson Insurance and American Home Assurance policies and coverage determination correspondence from Jefferson Insurance and American Home Assurance responsive to Gen Re's request for information for Gen Re to consider whether the North Star policy is triggered (.4); review and analyze coverage correspondences from Gen Re to provide responses to request for information and further policy analysis (.8); draft letter to Gen Re re: status of tenders to insurers and insurers' responses, responses to request for information inquiries, and response to prior coverage correspondences (5.2).	8.30	5,942.80
A. Iniguez	10/31/22	Review Netdocs and shared drive files for 2019 correspondence with Gary Seligman re: American Home Insurance and correspondence with P. He re: document production.	0.40	153.20
Subtotal Task: 702 - Asset Analysis and Recovery			327.90	\$252,458.10
<u>Task: 705 - Fee/Employment Applications</u>				
A. V. Alfano	10/02/22	Email to S. Korchinski re: amended declaration for employment application in connection with fee application.	0.10	\$88.20

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A. V. Alfano	10/06/22	Draft J. Jean second supplemental declaration (.7, .4); review employment application (.2) and bankruptcy rules (.1) in respect of same; send draft to A. Troop under explanatory cover email (.1).	1.50	1,323.00
A. V. Alfano	10/10/22	Implement A. Troop comments to supplemental declaration of J. Jean and send declaration to S. Greenspan.	0.30	264.60
A. V. Alfano	10/14/22	Follow up with S. Greenspan re: J. Jean supplemental declaration (.2); revise declaration (.2).	0.40	352.80
S. Korchinski	10/14/22	Draft third monthly fee statement, including calculation of time and fees by task code.	2.10	840.00
A. V. Alfano	10/16/22	Review draft monthly fee statement sent by S. Korchinski (.4); email to S. Korchinski re: same (.2).	0.60	529.20
A. V. Alfano	10/17/22	Attention to supplemental declaration and September monthly fee statement (.1); brief review of docket in respect of same (.1).	0.20	176.40
A. V. Alfano	10/18/22	Follow up with S. Greenspan re J. Jean supplemental declaration.	0.10	88.20
S. Korchinski	10/18/22	Finalize and prepare third fee statement for filing.	0.40	160.00
A. V. Alfano	10/22/22	Check docket and briefly review as-filed supplemental declaration.	0.20	176.40
A. V. Alfano	10/27/22	Review interim compensation procedures and emails with S. Greenspan re: same.	0.20	176.40
Subtotal Task: 705 - Fee/Employment Applications			6.10	\$4,175.20

Task: 706 - Fee/Employment Objections

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P. He	10/01/22	Communicate with S. Greenspan re: research and analysis of enforcing litigation billing guidelines, strategies for status update to Chubb re: Hector Bush #2, correspondence to Chubb re: renewal of tender of claims, arguments supporting full recovery of defenses costs and expenses (.3); revise and finalize letter to Chubb re: status update of Hector Bush #2 and outstanding reimbursements owed (.8); revise and finalize letter to Chubb re: renewal of tenders (.6).	1.70	\$1,217.20
Subtotal Task: 706 - Fee/Employment Objections			1.70	\$1,217.20
<u>Task: 707 - Mediation</u>				
S. D. Greenspan	10/01/22	Review and revise research memo re: trigger of coverage under New York law for latent emotional distress injuries in connection with preparation for mediation (.4); correspondence with P. Blood re: same (.2).	0.60	\$599.40
J. D. Jean	10/01/22	Confer with S. Greenspan re: coverage trigger issues (.2); review research re: same (.6).	0.80	1,130.40
S. D. Greenspan	10/02/22	Correspondence with R. Chiu re: matrix of settlement demands in connection with preparation of PowerPoint presentation for mediation with the Committee.	0.20	199.80
P. He	10/02/22	Correspondence with S. Greenspan re: strategy for preparation of correspondences concerning outstanding invoices, coverage charts, mediation strategy, settlement demands and payouts (.4); strategize and implement plan for pursuit of Chubb for outstanding invoices and correspondences concerning invoices and amounts owed by Chubb (.3).	0.70	501.20
J. D. Jean	10/02/22	Confer re: newly discovered policy info and claims thereon.	0.30	423.90

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B. Fleishman	10/03/22	Review mediation materials in connection with preparation for mediation and confer with J. Jean and S. Greenspan re: same.	0.50	628.00
S. D. Greenspan	10/03/22	Prepare/draft PowerPoint deck re: insurance issues for the mediation with the Committee (6.4); correspondence/conferences with R. Chiu, B. Baker, PW team and Pillsbury team in connection with same (1.2); review and analyze settlement demand analysis in connection with preparation of PowerPoint presentation (.4); correspondence with PW team and client re: logistics for mediation session (.2).	8.20	8,191.80
P. He	10/03/22	Correspondence with S. Greenspan re: strategy, matrix of claims and payments, and insurance issues for mediation (.4); review, revise and input mediation presentation on insurance issues and considerations (1.4).	1.80	1,288.80
J. D. Jean	10/03/22	Review and respond to emails, including from S. Greenspan, re: new Chubb claims handler and demand for Chubb to pay defense costs in full from inception (.3); review and respond to emails re: mediation PowerPoint (.2); confer with B. Fleishman and S. Greenspan re: same (.4).	0.90	1,271.70
J. N. Vazquez	10/03/22	Review recently discovered historical policy documents to determine if assignment language and/or duties imputed on insureds change analysis of assignability of policies to Compensation Trust (5.9); prepare chart of provisions re: same (2.1); draft summary re: same (2.1).	10.20	6,701.40
B. Fleishman	10/04/22	Review and analyze memo on executory contracts and assignment clauses in connection with analysis of whether proceeds to the policies can be assigned to the Compensation Trust.	0.50	628.00

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S. D. Greenspan	10/04/22	Conferences with PW team re: preparation for mediation (.3); correspondence with Judge Chapman and PW team re: setting up a call to discuss mediation preparation and preparation of settlement offer (.2); prepare for and attend conference with Judge Chapman and PW team re: mediation preparation (.2); prepare and revise draft PowerPoint deck re: insurance issues for the mediation with the Committee and further revise in light of comments from PW team, B. Baker and Pillsbury team (including J. Jean) (2.1); correspondence/conferences with R. Chiu, B. Baker, PW team (including J. Jean) and Pillsbury team in connection with same (1.1); correspondence with W. Clareman re: preparation of insurance PowerPoint deck for the mediation (.2); review and analyze Madison's draft mediation settlement proposal (.4); correspondence with M. Kosnitsky, J. Jean and D. Devine re: preparation for mediation and client meeting (.3); correspondence with M. Levi, Teneo and B. Baker re: content and revisions to PW and Pillsbury PowerPoint presentations for the mediation and financial information for same (.3).	5.10	5,094.90
J. D. Jean	10/04/22	Review and revise PPT for mediation and confer with S. Greenspan re: sme (1.4); review research re: assignabilty of policy proceeds to Compensation Trust (.4).	1.80	2,543.40
J. N. Vazquez	10/04/22	Review recently discovered historical policy documents to determine if assignment language and/or duties imputed on insureds change analysis of assignability of policies to trust (5.4); prepare chart of provisions re: same (.4).	5.80	3,810.60

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S. D. Greenspan	10/05/22	Review and revise draft research memorandum re: whether Madison Square Boys and Girls Club's ("Madison") insurance policies imposed a duty to defend on it, raising a potential conflict of interest that was at issue in a similar dispute - the Camden Archdiocese litigation - in connection with assignment of the rights to coverage for the CVA Claims to a settlement trust as part of a reorganization of Madison and review/analyze cited caselaw (1.6); correspondence with PW team re: same (.4); review chart of assignment/anti-assignment clauses in Madison's policies in connection with the foregoing (.4); correspondence with J. Dold re: mediation (.2); correspondence with P. He re: mediation strategy, insurance issues for mediation, preparation of charts with data and summary of claims tenders to insurers (.7); confer with J. Jean re: mediation (.3).	3.60	3,596.40
P. He	10/05/22	Correspondence with S. Greenspan re: mediation strategy, insurance issues for mediation, preparation of charts with data and summary of claims tenders to insurers and responses from insurers (.6); prepare, revise, and finalize charts for mediation with data and summary of claims tenders to insurers and responses from insurers and statuses (4.2).	4.80	3,436.80
J. D. Jean	10/05/22	Review PPT and memos re: transfer of insurance assets re: mediation (1.6); confer with S. Greenspan re: mediation (.3).	1.90	2,684.70
J. N. Vazquez	10/05/22	Draft memorandum to client re historical policy documents and provide analysis of assignability of policies to trust.	7.50	4,927.50
B. J. Coffey	10/06/22	Review and revise coverage chart for accuracy.	0.60	280.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	10/06/22	Prepare for mediation including review and analysis of coverage correspondence with insurance carriers and secondary evidence of policies (2.4); meeting with client (D. Devine and T. McChristian) re: preparation for mediation (1.2); attend mediation with the Official Committee of Unsecured Creditors, PW team and client (5.7); conference with P. He re: results of mediation and re: strategy of pursuing the carriers to get them to participate in the mediation and contribute to the settlement (.4); review cast of characters chart in preparation for mediation (.2); correspondence with B. Fleishman re: results of first day of mediation (.2); confer with J. Jean re: Chubb (.3).	10.40	10,389.60
P. He	10/06/22	Correspondence with S. Greenspan re: mediation summary, strategy, insurance carrier participation, insurance issues for mediation, mediator's goals, and Federal Rules of Bankruptcy Procedure Rule 2004 demands to insurers (.4); correspondence with M. Levi of PW re: Federal Rules of Bankruptcy Procedure demands to insurers and mediation strategy (.3).	0.70	501.20
J. D. Jean	10/06/22	Confer with S. Greenspan re: Chubb and defense costs (.3); review correspondence re: newly discovered policies and approach re: same (.6).	0.90	1,271.70
B. Fleishman	10/07/22	Conference calls with PW, S. Greenspan, J. Jean, P. He and B. Baker re: insurance companies and mediation and follow up memo edit.	1.00	1,256.00

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S. D. Greenspan	10/07/22	Telephone conference with B. Fleishman re: involving the carriers in the mediation (.2); telephone conference with PW team, B. Fleishman, P. He and B. Baker re: involving the carriers in the mediation and obtaining their cooperation (.5); telephone conference with P. He re: preparation of memo for mediator and PW re: carrier involvement in mediation (.2); correspondence and conference with PW and Pillsbury team re: involving all insurers in the mediation and parameters of plan and terms for same, including outline of letter to carrier re: participation in mediation and summary of each carrier's coverage determination (1.8); correspondence with M. Levi and P. He re: Judge Lane's orders re: mediation (.2); review and analyze Judge Lane's Mediation Order and other of Judge Lane's orders relevant to the preparation of the letter to the insurers re: upcoming mediation (.4); review Gen Re reservation of rights letter in connection with inviting Gen Re to mediation (.3); correspondence with PW team re: engaging Jefferson/Allianz and re: preparation of draft letter to all insurers re: mediation and draft confidentiality/joint defense agreement (.2).	3.80	3,796.20

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P. He	10/07/22	Telephone conference with PW team, B. Baker of Friedman Kaplan, and Pillsbury team re: mediation strategy (.6); communications with S. Greenspan and B. Fleishman of Pillsbury re: memo of and strategy to incorporate insurers' input and interests for mediation purposes, joint defense and confidentiality agreements (.9); review communications from A. Kornberg of Paul Weiss and S. Greenspan re: mediation strategy and insurers participation (.3); draft and review memo and outline of mediation strategy to correspond with insurers (.6); strategize and input on Joint Defense And Confidentiality Agreement with Insurers for mediation (.3); communications with L. Varga and M. Levi of Paul Weiss re: strategy involving insurers at mediation (.3); review communication from S. Greenspan re: strategy to involve insurers at mediation (.3); review and analyze bankruptcy court's orders for mediation and formulate strategy for insurers (.4).	3.70	2,649.20
J. D. Jean	10/07/22	Confer with B. Fleishman re: Chubb and defense costs (.2); review correspondence re: newly discovered policies and approach re: same (.6).	0.80	1,130.40
S. D. Greenspan	10/08/22	Correspondence with A. Kornberg and Pillsbury team re: insurer involvement at mediation (.2); correspondence with Pillsbury team re: use of/attachment of Judge Lane's Mediation Order to the letter to the insurers inviting them to attend the mediation with us for consultation (.2).	0.40	399.60

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P. He	10/08/22	Correspondence with Pillsbury team re: strategy for mediation strategy and joint defense and confidentiality agreements for insurers (.3); review communications from A. Kornberg of PW and S. Greenspan and other Pillsbury team members re: mediation strategy and insurers involvement at mediation (.3); draft letter to insurers re: bankruptcy and mediation (.4).	1.00	716.00
P. He	10/09/22	Draft joint interest confidentiality and privilege agreement (2.6); draft letter to interested insurers concerning mediation attendance, bankruptcy filing, demand final coverage determinations, and status of various insurers' coverage positions, tenders, responses and communications with Pillsbury team re: same (7.3); review and analyze insurers' coverage positions (1.3).	11.20	8,019.20
S. D. Greenspan	10/10/22	Prepare and revise draft letter to all insurers re: Madison's reorganization case, inviting them to the mediation if they are eligible insurers, summarizing each insurers' coverage positions and revise the annexed draft Joint Interest Confidentiality and Privilege Agreement (5.3); correspondence with Pillsbury and PW team (including J. Jean and P. He) re: revisions to same and mediation strategy (1.3); correspondence with J. Jean re: results of/summary of the first day of the mediation (.3); conference with J. Jean re: mediation, coverage strategy and approach re: Allianz, New York Liquidation Bureau and Chubb (.9).	7.80	7,792.20

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P. He	10/10/22	Correspondence with S. Greenspan re: strategy for notice to insurers for mediation consultation, mediation strategy and joint defense and confidentiality agreements for insurers (.4); review communications between PW team and S. Greenspan of Pillsbury re: mediation strategy and insurers involvement at mediation (.4); further draft and revise letter to insurers re: bankruptcy and mediation (.2); correspondence with A. Iniguez and S. Greenspan re: necessary documents for PW team (.3).	1.30	930.80
J. D. Jean	10/10/22	Confer with S. Greenspan re: mediation, coverage strategy and approach re: Allianz, Liquidation Bureau and Federal (.9); review and respond to emails re: coverage correspondence and Chubb (1.2).	2.10	2,967.30
B. J. Coffey	10/11/22	Create table of applicable policies to send to insurers and teleconference with S. Greenspan re same.	1.90	889.20
B. Fleishman	10/11/22	Review letters to carriers and conference call re: privilege protection (.7); correspondence with PW team, Madison and S. Greenspan re: settlement negotiations (.4)	1.10	1,381.60

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S. D. Greenspan	10/11/22	Correspondence with P. He re: revisions to draft Joint Interest Agreement (.2); review suggested revisions from PW team and B. Baker to draft letter to the insurers re: the mediation and revise letter to insurers (.8); correspondence with B. Baker and PW team re: same (.6); revise schedule of policies and coverage positions appended to the insurer letter re: the mediation (1.2); correspondence with M. Pierro, P. He, B. Fleishman and B. Coffey re: same (1.1); review and analyze the settlement counteroffer from the Committee (.4); correspondence with PW team, D. Devine, T. McChristian and B. Fleishman re: response to the Committee's counteroffer (.4); confer with J. Jean re: draft Joint Interest Agreement and mediation (.3); confer with J. Jean re: Chubb's refusal to execute Joint Interest Agreement and strategy re: same (.3).	5.30	5,294.70
P. He	10/11/22	Review multiple communications between PW team, B. Baker of Friedman Kaplan, and S. Greenspan of Pillsbury re: mediation strategy involving insurers, revisions and input on letter to insurers re mediation of CVA claims and bankruptcy, mediation strategy and insurers consultation and attendance at mediation (.6); review PW team's revisions and comments for letter to insurers re mediation of CVA claims (.5); review PW team's revisions to joint interest and confidentiality agreements (.2); correspondence with S. Greenspan re: revisions to draft Joint Interest Agreement (.2); review Friedman Kaplan's revisions and comments for letters to insurers re mediation of CVA claims (.2) review further draft and revise letter to insurers regarding bankruptcy and mediation (.2); review and analyze Madison's settlement term sheet (.2).	2.10	1,503.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	10/11/22	Review and revise letter to insurers re: mediation (.3); confer with S. Greenspan re: draft Joint Interest Agreement re: mediation (.3); confer with S. Greenspan re: Chubb's refusal to execute draft Joint Interest Agreement and strategy re: same (.3).	0.90	1,271.70
S. D. Greenspan	10/12/22	Correspondence with M. Levi re: data room production to the Committee, RU and Chubb (.2); conference with Pillsbury team re: same (.2); conference with M. Levi re: preparation for tomorrow's mediation session with Allianz and re: data room production (.3); correspondence with Pillsbury team re: insurer mediation letter (.2); correspondence with PW team, D. Devine, T. McChristian, R. Eaddy and B. Baker re: response to the Committee's counteroffer and setting up a strategy call (.4); review and analyze NDA with Chubb in connection with mediation (.2); correspondence with B. Fleishman re: same (.2); correspondence with PW team, B. Baker and Pillsbury team re: attendance at a conference tomorrow with the mediator and the Committee (.2); confer with J. Jean re: coverage and plaintiffs (.9).	2.80	2,797.20
P. He	10/12/22	Communicate with S. Greenspan and Pillsbury team re: mediation process and history, Chubb's execution of nondisclosure agreement, involvement of insurers and joint interest agreement.	0.80	572.80
J. D. Jean	10/12/22	Confer with S. Greenspan re: coverage and plaintiffs (.9); review client emails re: demand and responses to same (.3); review strategy (.7); review coverage correspondence re: policies and additional insurers (.7).	2.60	3,673.80

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B. Fleishman	10/13/22	Attend mediation session conference call with Judge Chapman, PW team, S. Greenspan, the Committee and B. Baker (1.4); conference with PW team, B. Baker and S. Greenspan re: response to discovery aspect of Committee's settlement counterproposal and review correspondence with insurers (.7)	2.10	2,637.60

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S. D. Greenspan	10/13/22	Conference with PW team, B. Baker and B. Fleishman re: response to the discovery aspect of the Committee's settlement counterproposal (.4); correspondence with B. Baker, P. He and A. Iniguez re: amount of defense costs Chubb has failed to pay in preparation for mediation call with the Committee including hour rate reductions down to panel counsel rates and application of Chubb litigation guidelines and review of documents attached to correspondence (.4); review discussion points for all with mediator and the Committee (.2); correspondence with Madison leadership, PW team and B. Baker re: setting up strategy call (.2); telephone conference with Madison leadership, PW team and B. Baker re: reparation for call with mediator and the Committee re: response to the Committee's settlement counteroffer (.4); attend mediation session with Judge Chapman, the Committee, PW team and B. Baker (1.5); review email from Motors Insurance Corporation reaffirming its disclaimer and declining to participate in the mediation and correspondence with PW team and client re: same (.2); research NY caselaw re: whether an insurer's panel counsel rates will be considered to be the maximum reasonable rate in New York for defense counsel and re: enforceability of a carriers' litigation management guidelines (in connection with preparation for meeting with mediator and the Committee re: unpaid defense cost claim) (.4); correspondence with P. He re: same (.2); prepare letter to all insurers inviting all eligible insurer have not denied coverage and who sign the Joint Agreement to attend an information call with our firm, Madison's bankruptcy counsel, Paul, Weiss, Rifkind, Wharton & Garrison, LLP ("Paul Weiss"), and its defense counsel, Friedman Kaplan Seiler & Adelman LLP ("FK") to discuss settlement status (1.2);	6.70	6,693.30

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		correspondence with PW team, B. Baker and B. Fleishman re: revisions to same and attendance at the informational call (.6); review correspondence from P. He re: results of his NY law research into reasonableness of defense counsel fees for purposes of discussion with the Mediator and the Committee (.2); correspondence with Chubb's coverage counsel re: mediation (.2); correspondence from the Committee requesting a conference to discuss insurance issues (.2); confer with J. Jean re: further mediation issues (.4).		
P. He	10/13/22	Correspondence with Pillsbury team, PW team, B. Baker re: Alan Gray reduction of payments, recovery of defense costs and fees (.3); correspond with Pillsbury team, PW team and B. Baker of Friedman Kaplan re: insurer's role in Madison's bankruptcy filing and Chubb's failure to defend as contribution to insolvency of Madison (.5); review and analyze Committee's counterproposal (.2); correspondence with S. Greenspan re: recovery of defense costs and fees and assignment of rights and estimated value of rights against insurers for defense costs (.9); review communication between S. Greenspan and I. Nasafir of Pachulski re: settlement and defense costs (.2).	2.10	1,503.60

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J. D. Jean	10/13/22	Review and respond to emails re: BK filing and Chubb's actions that contributed to it (.4); confer with S. Greenspan re: same and re: demand for defense costs and indemnity payments (.6); analysis re: Committee demand and response to same (.3); review and respond to PW emails re: mediation (.4); confer with S. Greenspan re: further mediation issues (.4); confer with S. Greenspan re: allocation with Allianz and Chubb re: their shares of the costs of the affirmative claim against Rockefeller University (.3); review letter and comment to Chubb letter and letters to insurers re: participation (.8).	3.20	4,521.60
B. Fleishman	10/14/22	Conference call with plaintiff attorney re: coverage assets (1.3); correspondence with Pillsbury team in connection with same work on getting carriers information and JDA execution for mediation (.3).	1.60	2,009.60

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S. D. Greenspan	10/14/22	Correspondence with I. Nasatir, Pillsbury team, PW team and B. Baker re: scheduling call with the Committee to discuss insurance issues related to defense costs claim (.3); prepare for and attend telephone conference with I. Nasatir, B. Baker and B. Fleishman re: insurance issues relating to the mediation (1.2); correspondence and conference with B. Baker and P. He re: preparing responses to the Committee's insurance-related questions from the call with the Committee (.4); correspondence with I. Nasatir and B. Baker re: SDNY cases holding that insurer panel counsel rates are not the measure of the reasonableness of defense counsel fees (.2); review letter from SiriusPoint reaffirming the denial of coverage in anticipation of the mediation (.2); review and analyze coverage position letter of Gen Re (North Star and Monarch), reserving rights on some policies, disclaiming on others and restating the RFIs and review Gen Re's execution of the Joint Agreement (.3); review email from and execution by Allianz/Jefferson of the Joint Agreement (.2); correspondence with W. Clareman re: status of contact with Chubb re: Joint Agreement (.2); review letter from General Star reiterating its disclaimer and refusing to attend the mediation (.2); review Chubb/FK correspondence re: Chubb billing guidelines in connection with responding to the Committee's inquiry (.2); correspondence with B. Baker re: her firm's lack of acceptance of the Chubb litigation guidelines (.2); correspondence with J. Dold and J. Jean re: Madison's refusal to accept the Chubb guidelines (.3); review draft outline of the carrier call re: mediation developments (.2).	4.10	4,095.90

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P. He	10/14/22	Conference call with B. Baker of Friedman Kaplan and Scott Greenspan re: bankruptcy committee's insurance questions for recovery of defense costs (.4); review communications between PW team and Pillsbury re: mediation strategy, defense costs (.2); communications with B. Baker of Friedman Kaplan and S. Greenspan re: defense costs. Chubb litigation billing guidelines, and strategy to respond to inquiries for valuation of insurance coverage (.4); review communications between J. Bullen of Allianz and S. Greenspan and agreement re: pre-mediation meeting and joint interest confidentiality and privilege (.2); review multiple communications between S. Greenspan, J. Jean and J. Dold re: Chubb litigation guidelines, and analyze communications re: dispute of Chubb's defense costs (.6), communicate with and review communications from G. Seligman of Wiley Rein re: joint interest confidentiality and privilege agreement (.2); review communication to J. Biondolillo of Chubb re: Joint Interest Confidential and Privilege Agreement, Federal's attendance of mediation and insurers' attendance of mediation, (.2); review communications from B. Fleishman and S. Greenspan re: agenda for meeting with insurers for mediation strategy (.2).	2.20	1,575.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	10/14/22	Confer re: AIG production and correspondence re: same (.3); review correspondence re: new policies and claimants (.3); confer re: response to AIG re: inadequate production and review/revise response re: same (.4); confer re: NY bad faith under Bi-Economy and Panasia in connection with forcing Madison into bankruptcy due to failure to defend and identify relevant insurance policies (.3); emails with J. Dold re: Chubb defense (.2); confer with S. Greenspan re: same and response to Chubb (.6); review GenRe requests and ROR (.3).	2.40	3,391.20
K. Woodcock	10/14/22	Conference with S. Greenspan re: research assignment re: reasonableness of attorney fees (.2); research NY law (and nationally) re: sex abuse cases discussing reasonableness of defense costs (4.8); correspondence with P. He re: legal research and analysis of reasonableness of defense costs under New York law (.4); research re: recoverability for consequential damages for bad faith under New York law (1.1).	6.50	4,153.50
J. D. Jean	10/15/22	Confer re: tender to Chubb and other insurers.	0.30	423.90
S. D. Greenspan	10/16/22	Correspondence with PW team re: status of settlement negotiations and re: staffing insurer call on Tuesday and re: Chubb status on Joint Agreement (.3); correspondence with B. Baker re: providing insurers with information concerning the underlying claims (.2); correspondence with PW team and Committee re: settlements in underlying actions (.2).	0.70	699.30

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P. He	10/16/22	Correspond with B.Baker re: strategy for pre-mediation and informational meeting with insurers, status of insurers' coverage and defense, and participation in Madison's defense of CVA Actions and requisite information necessary to inform insurers re: mediation and settlement for purposes of insured and insurer cooperation (.4); review communications from PW team and S. Greenspan re: strategy for pre-mediation meeting, settlement demands and contribution, collateral source and Chubb's obligation (.3); review cast of characters involved in bankruptcy and mediation (.2).	0.90	644.40
B. Fleishman	10/17/22	Conference call with PW team, B. Baker, S. Greenspan and P. He re: preparation for tomorrow's insurer meeting (1.1); correspondence with B. Baker and S. Greenspan re: confidentiality provisions in settlement agreements in underlying actions, NDA in the bankruptcy and re: Chubb's refusal to execute the Joint Defense Agreement (.2); correspondence with S. Greenspan re: response to Jefferson's requests for information (.2).	1.50	1,884.00

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S. D. Greenspan	10/17/22	Conference with counsel for AIG re: negotiations for Joint Defense Agreement and re: coverage position letters (.2); conference with M. Plevin of Crowell re: dispute over executing the Joint Defense Agreement (.2); conference with J. Weber re: same (.2); correspondence with PW team and B. Baker re: scheduling prep call for insurer meeting (.2); conference with PW team, B. Baker, B. Fleishman and P. He re: preparation for tomorrow's insurer meeting (1.1); correspondence with PW team re: Motorists Insurance Corporation's refusal to participate in mediation and reaffirmance of disclaimer (.2); review correspondence from Security Mutual re: mediation and correspondence with Pillsbury team re: same (.2); review correspondence from L. Klein, coverage counsel for Chubb refusing to execute the Joint Defense Agreement and taking numerous positions re: mediation and coverage and correspondence and conferences with PW team and Pillsbury team re: response to same and prepare response to same (1.2); correspondence and conference with W. Clareman re: mediation (.3); review and analyze NDA with Chubb in connection with its refusal to execute the Joint Defense Agreement (.2); review correspondence from N. Valenza-Frost, counsel for AIG, and attached proposed revisions from AIG to the Joint Defense Agreement and requesting documentations re: AIG policies and prepare correspondence to AIG inviting it to the information call re: the mediation and review correspondence from N. Valenza-Frost re: AIG invitees to same (.2); correspondence with B. Baker, Pillsbury team and PW team re: AIG's proposed revisions to the Joint Defense Agreement (.2); correspondence with M. Pierro and B. Coffey re: response to AIG's request for documentation re: AIG policies	6.70	6,693.30

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		(.2); correspondence with N. Valenza-Frost re: Madison's intent to produce all documentation re: AIG policies and scope of production (.2); correspondence with S. Roman, counsel for Chubb, re: mediation call (.2); review and analyze Madison's draft settlement proposal to the Committee and the Committee's settlement proposal to Madison (.6); correspondence with B. Baker and B. Fleishman re: confidentiality provisions in settlement agreements in underlying actions, NDA in the bankruptcy and re: Chubb's refusal to execute the Joint Defense Agreement (.2); correspondence with N. Valenza-Frost re: execution of Joint Defense Agreement between AIG and Madison (.2); correspondence to all insurer counsel re: Madison's draft settlement counterproposal and the Committee's counterproposal to which it responds (.2); confer with J. Jean re: claims against insurers and assignability (.5).		

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P. He	10/17/22	Review communication from D. Walters of Security Mutual Insurance Co. re: disclaimer and rejection of mediation attendance (.2); correspondence with S. Greenspan re: mediation strategy and insurers' limited involvements at mediation (.4) correspondence with S. Greenspan re: Chubb's refusal to stipulate to joint interest and confidentiality agreement and Chubb's executed nondisclosure agreement with Madison (.2); review Chubb's communications re: mediation, request for information, joint interest and confidentiality agreements (.3); conference call with PW team, Pillsbury team, S. Greenspan, B. Fleishman and B. Baker of Friedman Kaplan to develop strategy re: insurers' involvement with mediation and counterproposal to Committee (1.1); review Paul Weiss' charts of status of CVA actions and lists to the Committee (.3); review correspondence between S. Greenspan and Paul Weiss team re: mediation strategy, Judge Chapman's position, insurers' limited involvement at mediation (.5); review correspondence between S. Greenspan and PW team re: strategy to respond to L. Klein on behalf Chubb re: Chubb's involvement at mediation and disagreement for the need of a joint interest and confidentiality agreements (.4); review correspondence between S. Greenspan and PW team re: meeting to forge strategy to update insurers' and involvement in mediation and settlement, joint interest and confidentiality agreement between AIG and Madison, AIG's document productions re: evidence of policies and investigation into policies (.4); review and analyze mediation settlement proposal from Paul Weiss (.5); review L. Klein email on behalf Chubb re: Chubb's mediation involvement and refusal to execute joint interest and confidentiality agreements (.2).	4.50	3,222.00

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J. D. Jean	10/17/22	Review and respond to emails and proposals re: mediation (.3); confer with S. Greenspan re: claims against insurers and assignability (.5); confer re: Bi-Economy and Panasia line of cases and consequential damages research re: defense costs and forcing into bankruptcy (.8); confer re: demands on Chubb and responses to L. Klein (.4); confer and emails with S. Greenspan re: denials of coverage and availability of policy evidence (.8).	2.80	3,956.40
K. Woodcock	10/17/22	Research re: recoverability of Consequential Damages in NY in breach of insurance context.	6.00	3,834.00
B. Fleishman	10/18/22	Prepare for attend and follow-up re: mediation conference call with eligible insurance carriers (1.7); correspondence with J. Jean, S. Greenspan and P. He re: response to correspondence from Chubb's coverage counsel refusing to consent to Madison's settlement counterproposal to the Committee or waive consent to settle provisions in the policies (.3); correspondence with S. Greenspan re: draft letter to AIG's coverage counsel responding to AIG's coverage position letter (.2); correspondence with S. Greenspan re: New York law re: recoverability of consequential damages against insurers for bad faith (.2).	2.40	3,014.40

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S. D. Greenspan	10/18/22	Review PW draft presentation for the insurer call and revise same and correspondence with PW team, Pillsbury team and B. Baker re: same (.7); draft and revise presentation for the insurer call and correspondence with PW team, Pillsbury team and B. Baker re: same (1.6); review revised settlement proposal to the Committee (.2); conference with J. Jean re: preparation for the mediation call with the insurers (.2); attend mediation meeting with PW team, B. Baker and carriers (1.1); conference with B. Fleishman and J. Weber of PW re: demand to insurers to consent to settlement or waiver consent to settle provisions (.2); correspondence with PW J. Weber and A. Kornberg re: bad faith/consequential damages clam of Madison against its insurers (.2); correspondence with PW team re: prior settlement offers provided to Chubb and re: providing AIG access to the data room (.2); prepare request for insurers to consent to Madison's settlement Counterproposal to the Committee or, in the alternative, to waive any and all consent to settlement provisions/requirements in the insurers' policies and correspondence with PW team, Pillsbury team and B. Baker re: revisions to same and revise same (.5); review correspondence from AIG refusing to consent to Madison's settlement counterproposal to the Committee or waive consent to settle provisions in the Policies and correspondence with Pillsbury and PW Teams re: same (.2); correspondence with J. Weber re: authorization to transmit Madison's settlement Counterproposal to the mediator (.2); review correspondence from Chubb's coverage counsel refusing to consent to Madison's settlement counterproposal to the Committee or waive consent to settle provisions in the Policies and correspondence with Pillsbury and PW Teams re: same (.3); prepare response to	6.90	6,893.10

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
		correspondence from Chubb's coverage counsel refusing to consent to Madison's settlement counterproposal to the Committee or waive consent to settle provisions in the policies and correspondence with J. Jean and B. Fleishman re: same (1.3).		
P. He	10/18/22	Attend meeting with insurers re: mediation strategy, counter-proposals, status of actions, and client's reorganization in bankruptcy (1.0); review multiple communications between Pillsbury team and Paul Weiss team re: settlement strategy, mediation strategy, outline of agenda for meeting with insurers, assignment of defense costs and consequential damages, revisions to Madison's counter proposal to committee, mediation data room, strategy to demand insurers for waiver to consent to settlement, insurers' responses refusing to waive consent to settle (1.6); review revisions to Madison's settlement proposal (.2); review legal research re: assignment of consequential damages and extra-contractual claims (.2); review communication from N. Valenza-Frost of Carlton Fields re: AIG's refusal to waive consent to settlement (.2); review communication from S. Roman of Robinson & Cole on behalf of Federal and Century re: mediation, bankruptcy, and Federal and Century's refusal to waive consent to settlement (.3); correspondence with S. Greenspan and B. Fleishman re: strategy to respond to Federal and Century's correspondence (.4).	3.90	2,792.40
J. D. Jean	10/18/22	Review and respond to emails with PW Team and proposals re mediation (.6); confer with S. Greenspan re: claims against insurers and assign ability (.4); confer re: Bi-Economy and Panasia line of cases (.6).	1.60	2,260.80

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K. Woodcock	10/18/22	Research re: consequential damages in NY in breach of insurance context - failure to defend, investigate (4.4); research re: assignment of a Bi-Economy claim (1.1).	5.50	3,514.50
S. D. Greenspan	10/19/22	Conference with M. Levi re: mediation meeting, mediation strategy and response to requests for information (.5); revise correspondence to Chubb's coverage counsel responding to Chubb's refusal to consent to Madison's settlement Counterproposal to the Committee or waive consent to settle provisions in the Policies and correspondence with J. Jean and P. He re: same (1.4); correspondence with Pillsbury team re: Chubb faith letter (.3); correspondence with PW and Pillsbury teams re: status of mediation (.2); prepare draft report to insurers re: status of settlement negotiations with the insurers and correspondence with A. Kornberg and Pillsbury team re: revisions same and finalize/send same (.4).	2.80	2,797.20

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S. D. Greenspan	10/19/22	Conference with W. Clareman re: bankruptcy and coverage strategy (.2); conference with S. Romani, counsel for Chubb re: Chubb information requests (.2); conference with B. Baker re: responding to requests for information (.4); conference with B. Baker and B. Fleishman re: Chubb's request for production of report (.4); conference with J. Jean re: same (.7); strategize re: adversary proceeding to recovery insurance proceeds and unpaid defense costs (.3); correspondence with Lighthouse, B. Baker and P. He re: review of proposed production to Jefferson and the proposed production (.6); correspondence with M. Pierro and B. Coffey re: verification of accuracy of revised coverage chart and confirmation of same (.2); correspondence with M. Levi re: production of revised coverage chart to the Committee and review M. Levi correspondence to Committee re: same (.2); correspondence with P. He re: status of preparation of coverage correspondence with insurers (.2); correspondence with P. He: response to Chubb's assertion of the Litigation Guidelines in its agreement to defend additional CVA Actions (.2); correspondence with B. Baker re: status of discovery in the CVA Actions in connection with preparation of response to Chubb's request for evaluations of liability, medical or psychological evaluations, or other materials assessing the merits and potential damages for the plaintiffs who allege abuse during the relevant policy periods (.2); correspondence with counsel for AIG and M. Levi re: production of policy information to the Committee (.2); correspondence with PW team, Pillsbury team and B. Baker re: response to Chubb's request for production of the report and privilege issues in connection with same (1.1); review memo re: privilege waiver issues in connection with same (.3); review	6.40	6,393.60

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		research memo and caselaw re: availability of consequential damages against Madison's insurers for breach of the duty to defend (.6); correspondence with M. Levi re: AIG's coverage position on the duty to defend and defense positions of all carriers (.2); conference with K. Woodcock re: status/result of research re: duty to defend (.2).		
P. He	10/19/22	Review communications with Paul Weiss team and S. Greenspan re: AIG document production, UCC requests, AIG policies, report, privilege, mediation status and updates (.7); correspondence with Pillsbury team re: mediation (.4); correspondence with Pillsbury team re: updates provided to Chubb, strategy to respond to Chubb's position rejecting request to consent or waive consent to settlement provisions for Madison counterproposal to the Committee's counterproposal, report, and underlying defense evaluations and discovery (.3); review communications from S. Greenspan re: mediation status and update (.2).	1.60	1,145.60
J. D. Jean	10/19/22	Review and respond to emails re: report and requests from Chubb (.9); confer with S. Greenspan re: same (.7); draft revisions to response to Chubb (.9); emails with PW Team re: mediation (.6).	3.10	4,380.30
K. Woodcock	10/19/22	Outline research analysis of availability of Bi-Economy consequential damages for breach of duty to defend (1.1); conference re: research for breach of duty to defend (.2); research and analyze NY law re: breach of duty to defend - partial payment of defense costs/underlying claim damages (3.9); draft analysis re: availability for consequential damages for breach of duty to defend (3.1).	8.30	5,303.70

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S. D. Greenspan	10/20/22	Revise correspondence to Chubb's coverage counsel responding to Chubb's refusal to consent to Madison's settlement Counterproposal to the Committee or waive consent to settle provisions in the Policies and correspondence with J. Jean re: same (1.3); correspondence with PW team and B. Baker re: draft correspondence to Chubb's coverage counsel and response to Chubb's request for materials from the underlying action (.6); correspondence with M. Levi and with J. Jean re: status of settlement negotiations with the Committee and re: reporting of same (.4); correspondence with A. Kornberg, J. Jean, Pillsbury team and Madison re: status of settlement negotiations with the Committee (.6).	2.90	2,897.10
P. He	10/20/22	Review communications to Chubb re: settlement proposals, status updates, and requests to fund settlements (.2); correspondence with S. Greenspan and Pillsbury team re: term sheets and settlement funding (.2); correspondence with S. Greenspan and Pillsbury team re: strategy to respond to Chubb's position rejecting request to settlement provisions for Madison's settlement counterproposal to the Committee's counterproposal, basis for refusing to disclose report and underlying defense evaluations and discovery (.3); review communications from S. Greenspan and Paul Weiss team re: committee counter offer, strategy to respond to Chubb's request for report, discovery and evaluations of plaintiffs of CVA actions, history of Madison's cooperation and disclosures of settlement and proposals, mediation developments and status (.5).	1.20	859.20
S. Korchinski	10/20/22	Review document collection for October 2021 letter to Chubb re: plan.	0.80	320.00

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S. D. Greenspan	10/21/22	Telephone conference with S. Roman and correspondence with counsel for AIG re: mediation status (.5); review the Committee's settlement Counteroffer (.3); prepare correspondence to insurers and insurer counsel re: same and correspondence with PW team and Pillsbury team re: same (1.1); correspondence with PW team re: funding for settlement (.3); correspondence with J. Jean and A. Kornberg re: settlement negotiations with the Committee (.3); correspondence with J. Jean re: settlement demands on insurers and re: consultation call with insurers next week (.4).	2.90	2,897.10
P. He	10/21/22	Review correspondences between Pillsbury team and PW team re: strategy to notify insurers of various mediation developments and consultation of insurers with respect to settlement positions and terms (.5); review correspondences between Pillsbury team and PW team re: Committee's response to Madison's counterproposal, mediation status, Judge Chapman's opinion and decisions of the mediation, contributions from Rockefeller towards settlement as part of Committee's demand, assignment of Madison's assets, rights to insurance claim for unpaid defense costs, bad faith and retention of rights to claims against insurers for consequential damages and professional fees (.4); review communication from S. Greenspan to insurers re: mediation status and consultation (.2).	1.10	787.60
J. D. Jean	10/21/22	Confer with S. Greenspan and A. Kornberg re: settlement negotiations (.3); correspondence re: same with S. Greenspan (.3); review status update re: mediation and strategy re: responding to coverage claims (.7).	1.30	1,836.90

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K. Woodcock	10/21/22	Draft summaries of decisions in Schanker, Schlather, and East Ramapo in connection with preparation of Chubb bad faith letter (2.9); revise research memo re: Bi-Economy consequential damages (.5).	3.40	2,172.60
S. D. Greenspan	10/22/22	Correspondence with Pillsbury team re: organizing a consultative call with the insurers, strategy for same and prior communications with insurers re: settlement (.7); review draft email to Judge Chapman re: Madison settlement counterproposal and prepare correspondence to and review correspondence from PW team, Madison, R. Chiu and Pillsbury team re: same (.6); correspondence with P. He re: strategy to demand Chubb re: breach of duty to defend, Federal's conditons to defend Madison, refute Chubb's imposition of rates and guidelines and multiple demands for defense and recovery of insurance benefits (.2).	1.50	1,498.50
S. D. Greenspan	10/23/22	Correspondence with A. Kornberg re: Counteroffer to the Committee and notice to the insurers (.2); correspondence with PW team, B. Baker and Pillsbury team re: organizing consultative call with the insurers and re: draft communication to the insurers re: same (.9); review draft Counteroffer to Committee and correspondence with PW team re: informing insurers about it (.3); correspondence to all insurers updating them on the settlement negotiations between Madison and the Committee and inviting them to a consultation conference (.4); correspondence between M. Levi and insurers re: same (.2); correspondence with W. Clareman and J. Jean re: settlement strategy (.3).	2.30	2,297.70

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P. He	10/23/22	Review communications between Pillsbury team and Paul Weiss team re: strategy for informational call with insurers, consultation with insurers for mediation and resolution, authorized Madison's mediation settlement proposal to committee (.5); review and analyze Madison's mediation settlement proposal as response to committee counteroffer (.3).	0.80	572.80
J. D. Jean	10/23/22	Review Committee correspondence (.3); confer with W. Clareman and S. Greenspan re: strategy (.3).	0.60	847.80
B. Fleishman	10/24/22	Prepare for and attend carrier conference call and assist in follow-up (1.2); correspondence with J. Jean and S. Greenspan re: response to L. Klein correspondence (.3).	1.50	1,884.00

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S. D. Greenspan	10/24/22	Correspondence from L. Klein, counsel for Chubb refusing to consent to Madison's latest settlement proposal (.2); review draft response to L. Klein correspondence (.2); correspondence with J. Jean and B. Fleishman re: response to L. Klein correspondence (.3); review response to all carriers from J. Jean to L. Klein email demanding they fund any settlement (.3); review notes of consultative meeting with insurers and conference with P. He: same (.4); correspondence with J. Jean and P. He re: Chubb's failure to pay defense costs (.2); correspondence from AIG's coverage counsel refusing to consent to settlement or waive consent to settlement provisions and correspondence with PW team and J. Jean re: response to same (.6); review correspondence from L. Klein refusing to consent to settlement or waive consent provisions and from A. Kornberg correcting misrepresentations in same (.4); correspondence with A. Kornberg re: forwarding Madison's Counterproposal to the Committee to the mediator (.2); review correspondence from counsel for Gen Re declining to consent to settlement or waive consent provisions (.3); correspondence with A. Kornberg and mediator re: Madison settlement counteroffer to the Committee (.2).	3.30	3,296.70

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P. He	10/24/22	Attend consultation meeting with insurers re: mediation strategy, committee's settlement offer, settlement counter-proposal, bankruptcy status, insurance contribution, assignment of rights to insurance proceeds, and client's reorganization in bankruptcy (.5); correspondence with S. Greenspan re: strategy for consultation meeting with insurers (.2); strategy to demand Chubb for insurance benefits for indemnity, reimbursement of defense costs and settlement contribution (.2); review multiple communications from Paul Weiss team and Pillsbury team re: mediation strategy, consultation with insurers, responses to Chubb's position, history of Chubb's participation of Madison's defense (.8); review communications from J. Jean re: mediation proposal to committee, demand to Chubb and rebuttal of L. Klein (.2); review communications from L. Klein on behalf of Chubb and A. Kornberg of Paul Weiss re: Madison's mediation proposal and Chubb's position for claims and defenses (.4); review correspondence from N. Valenza-Frost on behalf of AIG re: Madison's mediation proposal and AIG position for claims and defenses (.2); draft summary of consultation meeting with insurers (.3).	2.80	2,004.80
J. D. Jean	10/24/22	Review and respond to emails re: coverage and mediation (.3); review and respond to L. Klein emails re: mediation and Chubb (.4); confer re: draft response to L. Klein (.4); confer with S. Greenspan and B. Fleishman re: same (.3); attend conference with insurers and PW team (.7); follow up re: response to insurers' requests for information(.3).	2.40	3,391.20
S. D. Greenspan	10/25/22	Correspondence with A. Kornberg and Madison re: status of settlement negotiations with the Committee.	0.40	399.60

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P. He	10/25/22	Review communication from G. Seligman on behalf of Gen Re: refusal to consent to counter proposal or waive consent provisions and settlement clauses (.2); review communications between A. Kornberg of Paul Weiss and M. Plevin for Chubb re: Chubb's input for confirmation proceedings and assignment of insurance proceeds (.2); review communications from L. Davis for Jefferson re: refusal to consent to counter proposal, waive consent provisions and settlement clauses (.2);	0.60	429.60
J. D. Jean	10/25/22	Review correspondence from insurers (.3); confer with S. Greenspan re: same (.2); confer with B. Fleishman re: responsive data to support payment (.4); confer re: damage estimates (.2); review draft to insurers (.3); confer with S. Greenspan and B. Fleishman re: revisions to same (.3).	1.70	2,402.10
S. D. Greenspan	10/26/22	Review correspondence from J. Lucas, counsel for the Committee, re: settlement negotiations (.2); Correspondence with A. Kornberg and Madison re: status of settlement negotiations with the Committee (.4).	0.60	599.40
K. Woodcock	10/26/22	Prepare and revise letter to Chubb re: breach of duty to defend/consequential damages.	4.30	2,747.70
S. D. Greenspan	10/27/22	Correspondence with A. Kornberg and Madison re: status of settlement negotiations with the Committee (.6); correspondence with J. Lucas and A. Kornberg re: settlement status (.2).	0.80	799.20
P. He	10/27/22	Review communications between Paul Weiss team and Pillsbury team re: mediation status and strategy, Committee's counter proposal, and Madison's proposal.	0.40	286.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	10/27/22	Review and respond to emails re: correspondence with insurers and duty to defend (.6); confer with S. Greenspan re: same (.2); confer with S. Greenspan re: Chubb and defense costs (.6); emails re: counteroffer (.4).	1.80	2,543.40
K. Woodcock	10/27/22	Prepare and revise letter to Chubb re: breach of duty to defend/consequential damages.	3.40	2,172.60
J. D. Jean	10/28/22	Confer with S. Greenspan re: correspondence with insurers (.4); confer with PW and S. Greenspan re: settlement strategy (.6).	1.00	1,413.00
K. Woodcock	10/28/22	Prepare and revise letter to Chubb re: breach of duty to defend/consequential damages.	3.90	2,492.10
S. D. Greenspan	10/29/22	Correspondence with A. Kornberg re: status of settlement negotiations with the Committee.	0.20	199.80
K. Woodcock	10/29/22	Revise letter to Chubb re: bad faith and consequential damages (3.1); conference and correspondence with S. Greenspan re: revisions to Chubb bad faith letter (.7).	3.80	2,428.20
K. Woodcock	10/30/22	Revise letter to Chubb re: bad faith and consequential damages and correspondence with P. He in connection with same (3.2); correspondence with S. Greenspan re: additional arguments for Chubb bad faith letter (.2).	3.40	2,172.60
S. D. Greenspan	10/31/22	Correspondence with PW team, client and Pillsbury team re: status of settlement discussions with the Committee (.4); confer with J. Jean re: emails re: Chubb and settlement (.3).	0.70	699.30
P. He	10/31/22	Review communications between Pillsbury team and Paul Weiss team re: strategy to notify insurers of mediation, status of negotiations with the Committee, settlement proposals from Committee and Madison.	0.20	143.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	10/31/22	Review and respond to emails re: Chubb and settlement (.3); confer with S. Greenspan re: same (.3).	0.60	847.80
Subtotal Task: 707 - Mediation			271.80	\$247,917.90

Task: 709 - Plan and Disclosure Statement

J. N. Vazquez	10/01/22	Review recently discovered historical policy documents to determine if assignment language and/or duties imputed on insureds change analysis of assignability of policies to trust in connection with preparation of whether the rights to the policy proceeds can be assigned to the Compensation Trust (3.7); prepare chart of assignment provisions in policies (1.9).	5.60	\$3,679.20
Subtotal Task: 709 - Plan and Disclosure Statement			5.60	\$3,679.20

Subtotal: **\$524,069.40**
Discount: (149,348.45)
Total: **647.00** **\$ 374,720.95**

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	33.90	14,621.80
702 - Asset Analysis and Recovery	327.90	252,458.10
705 - Fee/Employment Applications	6.10	4,175.20
706 - Fee/Employment Objections	1.70	1,217.20
707 - Mediation	271.80	247,917.90
709 - Plan and Disclosure Statement	5.60	3,679.20
Subtotal:		\$524,069.40
		<i>Discount:</i> (149,348.45)
Total	647.00	\$ 374,720.95

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			

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<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
J. D. Jean	36.10	\$1,413.00	\$51,009.30
Senior Counsel			
B. Fleishman	13.50	\$1,256.00	\$16,956.00
S. D. Greenspan	186.80	999.00	186,613.20
Subtotal	200.30		\$203,569.20
Associate			
K. Woodcock	48.50	\$639.00	\$30,991.50
P. He	266.70	716.00	190,957.20
J. N. Vazquez	29.10	657.00	19,118.70
Subtotal	344.30		\$241,067.40
Senior Associate			
A. V. Alfano	3.60	\$882.00	\$3,175.20
Other Attorney			
B. J. Coffey	11.00	\$468.00	\$5,148.00
Paralegal			
A. Iniguez	34.10	\$383.00	\$13,060.30
S. Korchinski	17.60	400.00	7,040.00
Subtotal	51.70		\$20,100.30
Discount			(149,348.45)
Total	647.00		\$374,720.95

Disbursements Incurred

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
10/10/22	Task E107 - Express Courier Service	FedEX to Adrienne A. Harris Sup,NYS Dept. of Financial Services from Scott Greenspan	\$26.45
10/11/22	Task E107 - Express Courier Service	FedEX to GREG HANSCOM ASSISTANT GENERAL SIRIUS INTERNATIONAL INS. GROU from PHILIP HE	26.52
10/11/22	Task E107 - Express Courier Service	FedEX to Christine Smith AIG Complex Directo AIG Excess Casualty Claims from Philip He	21.96
10/11/22	Task E107 - Express Courier Service	FedEX to Gary P. Seligman North Star Reinsurance Corp. c/o from Philip He	21.96

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10/11/22	Task E107 - Express Courier Service	FedEX to Matthew O. Sitzler Shook Hardy & Bacon LLP from Philip He	21.00
10/11/22	Task E107 - Express Courier Service	FedEX to Gary P. Seligman Gen. Star National. Ins. Co. c/o, from Philip He	21.96
10/11/22	Task E107 - Express Courier Service	FedEX to CT Corporation Syst C/O Westport In f/k/a/ Puritan Insurance Company from Philip He	11.08
10/11/22	Task E107 - Express Courier Service	FedEX to Julia Bullen Claims Specialist Allianz Resolution Management (ARM) from Philip He	17.32
10/11/22	Task E107 - Express Courier Service	FedEX to Mr. Jimmy Biondolillo CHUBB from Philip He	21.96
10/11/22	Task E107 - Express Courier Service	FedEX to Gary P. Seligman The Monarch Ins. Co. of Ohio c/o from Philip He	21.96
10/11/22	Task E107 - Express Courier Service	FedEX to Mr. Jimmy Biondolillo CHUBB from Philip He	21.96
10/11/22	Task E107 - Express Courier Service	FedEX to Christine Smith AIG Complex Directo AIG Excess Casualty Claims from Philip He	21.96
10/11/22	Task E107 - Express Courier Service	FedEX to Adrienne H. Harris Superintendent NY State Dept. Of from Philip He	21.96
Total Disbursements:			\$278.05

Disbursement Summary

<u>Type</u>	<u>Amount</u>
Express Courier Service	278.05
Total:	\$278.05



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

December 6, 2022
Invoice No. 8506346
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through November 30, 2022

Matter Name	Services	Disbursements	Less Amount	
			Applied	Balance Due
Insurance Recovery	\$ 72,154.60	\$ 1,354.50	\$ 8,724.38	\$ 64,784.72
Total This Invoice:	\$ 72,154.60	\$ 1,354.50	\$ 8,724.38	\$ 64,784.72

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

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Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through November 30, 2022

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
K. Woodcock	11/14/22	Emails re: final Chubb payment tally.	0.20	\$120.80
P. M. Gillon	11/28/22	Review and comment on proposed Madison reorganization plan and treatment of claims and channeling injunction.	1.00	1,097.00
P. M. Gillon	11/29/22	Analyze/strategize re: advice to provide PW and Madison re: reorganization plan issues concerning insurance.	0.50	548.50
P. M. Gillon	11/30/22	Review and analyze rough conceptual draft reorganization plan and insurance terms.	0.20	219.40
Subtotal Task: 701 - Case Administration			1.90	\$1,985.70

Task: 702 - Asset Analysis and Recovery

S. D. Greenspan	11/01/22	Correspondence with E. Hynes of USLI re: 2011 policy (.2); correspondence with SiriusPoint re: SiriusPoint's attempt to delay responding to Madison's request that SiriusPoint execute joint defense agreement and re: mediation (.6); correspondence with P. He re: strategy for response to SiriusPoint (.2); revise Chubb bad faith letter (2.2); correspondence with K. Woodcock re: same (.2).	3.40	\$3,209.60
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	11/01/22	Review and analyze proposed changes to joint interest confidentiality and privilege agreement from S. Roman on behalf of Chubb (.2); correspondence with Pillsbury team re: analysis of Chubb's proposed changes to the joint interest confidentiality and privilege agreement (.2); review and analyze USLI policies in connection with coverage analysis (.2); review E. Hynes of USLI's communications re: additional policies issued to Madison (.2); correspondence with S. Greenspan re: strategies to respond to G.Seligman of Gen Re for request for information and updates with insurers, and response to G. Hanscom re: SiriusPoint's response and request for deadline (.4); draft correspondence to G. Hanscom of SiriusPoint re: demand for response from SiriusPoint and execution of joint interest confidentiality and privilege agreement (.9); draft letter to Gen Re re: response to request for information inquiries, and status of tenders to insurers and insurers' responses (2.7); prepare document production of underlying insurers AIG and Jefferson Insurance Company's policies and coverage correspondence responsive to Gen Re's request for information (1.4 Reviewing order letter; revising patent application prepared by non-US attorney, including revising claims; preparing and sending e-mail itemizing changes and requesting approval (if any)).	6.20	4,191.20
A. Iniguez	11/01/22	Correct names of PDFs of response letters from AIG in case folder (.4); update correspondence chart with email responses from USLI (.2).	0.60	216.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	11/02/22	Correspondence from G. Hanscom at SiriusPoint re: refusal to promptly respond to Madison Square correspondence re: draft joint interest agreement (.2); review revised Chubb bad faith letter (.2); correspondence with K. Woodcock re: same (.2); correspondence with K. Woodcock re: Alan Gray audits (in connection with preparation of Chubb bad faith letter) (.2); correspondence with J. Dold re: entity named used by Madison in response to USLI's questions (.2); correspondence with P. He and B. Baker re: underlying CVA Actions (in connection with preparation of Chubb bad faith letter) (.4); correspondence with E. Hynes of USLI responding to her questions re: entity used named by Madison (.3); correspondence with P. He re: analysis of underlying actions in connection with preparation of Chubb bad faith letter and review several Chubb coverage letters in connection with same (.4); correspondence with M. Pierro re: Mt. Vernon and Puritan documents in connection with newly discovered policies (.2); revise Chubb bad faith letter (2.2); correspondence with J. Jean re: duty to investigate (.2).	4.70	4,436.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	11/02/22	Correspondence with J. Dold of Madison re: entity names and policy search (.4); correspondence with G. Hanscom of SiriusPoint re: response from SiriusPoint (.3); correspondence with S. Greenspan re: Chubb's agreement to defend certain CVA Actions and strategy for insurance recovery (.4); correspondence with S. Greenspan re: strategy to respond to USLI's inquiry (.2); analyze Chubb's acceptance of coverage and defense of certain CVA Actions (.4); correspondence with K. Woodcock re: CVA actions and strategy for preparing Chubb bad faith letter (.4); correspond with B. Baker of Friedman Kaplan re: CVA Actions, Friedman Kaplan's case and settlement demand chart, amended complaint in Liguori matter (.7); draft correspondence to USLI re: response to inquiry of Madison's insured names (.4); correspond with M. Piero of Insurance Archaeology Group re: Mt. Vernon and Puritan policies (.4).	3.60	2,433.60
J. D. Jean	11/02/22	Review coverage correspondence and responses to multiple different insurers (.8); review Chubb correspondence (.4); conference with S. Greenspan re: duty to investigate (.2).	1.40	1,869.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	11/03/22	Correspondence with P. He and B. Baker re: underlying CVA Actions (in connection with preparation of Chubb bad faith letter) (.2); correspondence with M. Pierro re: Mt. Vernon and Puritan documents in connection with newly discovered policies (.2); correspondence with J. Jean re: strategy (.2); review and revise letter to Chubb re: Liguori Amended Complaint (.2); correspondence with P. He re: same (.2); correspondence with B. Baker re: facts re: underlying CVA Actions (in connection with preparation of Chubb bad faith letter) (.2); revise Chubb bad faith letter (1.8); correspondence with Pillsbury team re: revision to Chubb bad faith letter and revise letter (.6).	3.60	3,398.40
P. He	11/03/22	Correspondence with M. Pierro of Insurance Archaeology Group re: Mount Vernon and Puritan policies (.3); correspondence with S. Greenspan re: strategy for insurance recovery (.2); correspondence with S. Greenspan re: update to Chubb and bad faith letter to Chubb (.2); prepare letter to Chubb re: Liguori Amended Complaint update and demand for reimbursement of defense costs (.7); review letter to Chubb concerning bad faith and consequential damages of Chubb's actions (.4).	1.80	1,216.80
J. D. Jean	11/03/22	Review bad faith correspondence and Mt. Vernon issues and correspondence with S. Greenspan re: strategy.	0.30	400.50
S. D. Greenspan	11/04/22	Correspondence with J. Jean and B. Fleishman re: questions about and revisions to draft Chubb bad faith letter (.7); correspondence with P. He in connection with same (.4); revise Chubb bad faith letter (.6); correspondence with B. Baker and B. Fleishman re: redaction of defense counsel invoices (.2).	1.90	1,793.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	11/04/22	Correspond with S. Greenspan re: strategy for insurance recovery and bad faith letter to Chubb (.2); prepare bad faith letter to Chubb (.3).	0.50	338.00
S. D. Greenspan	11/07/22	Correspondence with M. Levi re: strategy call (.2); review AIG's responses and objections to the Committee Rule 2004 subpoenas (.7).	0.90	849.60
S. D. Greenspan	11/08/22	Correspondence with M. Levi re: strategy call (.2); review bar date order and prepare for and attend conference with J. Weber and M. Levi re: Court order requiring insurers who want access to the abuse proofs of claim to execute confidentiality order (.2); review and revise draft email from PW to insurers re: execution of confidentiality agreement in order to review abuse proofs of claim and revise insurer contact list (.4); correspondence with B. Baker re: invoice of all FK defense costs for production to Chubb and review same (.8).	1.60	1,510.40
P. He	11/08/22	Correspondence with B. Baker of Friedman Kaplan re: Friedman Kaplan invoices from inception to present for submission to Chubb.	0.20	135.20
S. D. Greenspan	11/09/22	Correspondence with B. Baker re: strategy (.2); correspondence with P. He re: preparation of correspondence to Chubb re: demand to pay all defense counsel invoices (.2); correspondence with B. Baker re: factual information for Chubb defense invoice payment demand letter and review factual information (.3); correspondence with Teneo re: payment of defense costs by Chubb (.2).	0.90	849.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	11/09/22	Correspondence with S. Greenspan re: strategy for preparing letter to Chubb re: defense costs of all CVA Actions and Friedman Kaplan invoices for all CVA Actions defended (.4); correspondence with R. Chiu of Teneo re: Chubb payments for defense costs (.7); review Friedman Kaplan's invoices from inception to present for submission to Chubb for inconsistencies (.4); strategize re: seeking reimbursement from Chubb for all defense costs of all CVA Actions and analyzing Chubb's payments rendered for coverage and defense of Madison (.6).	2.10	1,419.60
S. D. Greenspan	11/10/22	Review and revise draft letter to Chubb demanding payment of all FK invoices and correspondence with P. He re: same (.4); correspondence with Teneo and with P. He re: payment of defense costs by Chubb (.2); correspondence with B. Baker re: same (in connection with preparation of Chubb letter); correspondence with M. Levi re: abuse proofs of claim (.2).	0.80	755.20

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	11/10/22	Draft letter to Chubb re: submission of all Friedman Kaplan invoices for defense of all CVA Actions, demand for reimbursement of all defense costs, and explanation of defense fees (1.4); correspondence with S. Greenspan re: preparation of letter to Chubb re: demand for reimbursement of defense costs of all CVA Actions and submission of Friedman Kaplan invoices for all CVA Actions defended (.4); correspondences with R. Chiu of Teneo re: Madison's receipt of payments and calculation of Chubb payments for defense costs (.2); correspondence with B. Baker of Friedman Kaplan re: sums of defense costs, Friedman Kaplan's invoices, affirmative claim against The Rockefeller University, and differences of defense costs of all CVA Actions and Chubb payments for accepted coverage (.8); correspondence with S. Greenspan re: strategy to analyze discrepancy of sums of attorneys fees and costs and inquiries to investigate invoiced defense costs for all CVA Actions billed to Madison (.2); strategize re: discrepancy of sums of attorneys fees and costs for all CVA Actions billed to Madison (.6).	3.60	2,433.60
S. D. Greenspan	11/11/22	Correspondence from G. Hanscom at SiriusPoint affirming disclaimer and refusing to participate in the mediation (.2); correspondence with B. Baker, P. He and A. Iniguez re: amount of Chubb's prior payment of FK's defense costs in connection with preparation of defense costs payment demand letter and review documents relating to payments (.9); conference with J. Jean re: response to Chubb's claimed inability to comment on settlement terms (.4).	1.50	1,416.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	11/11/22	Correspondence with G. Hanscom of SiriusPoint re: response from SiriusPoint reiterating coverage position and policy investigation (.2); conference with B. Baker of Friedman Kaplan re: defense costs of all CVA Actions and affirmative claim against The Rockefeller University, and Chubb's reimbursement to Madison for cases Chubb agreed to cover (.2); correspondence with S. Greenspan re: strategy for preparing letter to Chubb demanding fees and costs for all cases Chubb has not agreed to cover, submission of Friedman Kaplan invoices consisting of over 800 pages, and amount invoiced to Chubb and payment amounts (.6); conference with A. Iniguez re: Chubb's payments to Madison, defense fees and costs for cases Chubb agreed to defend, and discrepancies of Friedman Kaplan's invoiced amounts (.7); correspondences with B. Baker of Friedman Kaplan re: Friedman Kaplan's invoiced amounts for cases Chubb agreed to cover, payments to Madison, invoices for Madison's affirmative claim (.7); correspondences with S. Greenspan re: analysis of Friedman Kaplan's invoiced amounts to Madison and strategy to determine Friedman Kaplan's invoiced amounts for cases Chubb agreed to cover (.4); strategize re: Friedman Kaplan's invoiced amounts to Madison for defense of all CVA Actions and affirmative claim, and evaluate Friedman Kaplan's invoiced amounts for cases Chubb agreed to cover (.7); draft letter to Chubb re: submission of all Friedman Kaplan invoices for defense of all CVA Actions, demand for reimbursement of all defense costs, and explanation of defense fees (.8).	4.30	2,906.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. He	11/14/22	Draft letter to Chubb re: submission of all Friedman Kaplan invoices for all CVA Actions and affirmative claims, demand for reimbursement of all costs and expenses for defense of CVA Actions and affirmative claims, and explanation of defense fees.	1.60	1,081.60
A. Iniguez	11/14/22	Download Madison Abuse Claim documents from Epiq shared drive (.4); upload same to folder in Madison case on Pillsbury shared drive (.3).	0.70	252.70

Subtotal Task: 702 - Asset Analysis and Recovery 46.20 \$37,114.40

Task: 705 - Fee/Employment Applications

A. V. Alfano	11/04/22	Review form of interim fee application received from S. Greenspan.	0.20	\$166.60
A. V. Alfano	11/07/22	Emails with S. Korchinski re: monthly fee statements.	0.20	166.60
A. V. Alfano	11/09/22	Review/analyze/strategize re: preparation of interim fee application.	0.20	166.60
S. Korchinski	11/11/22	Draft fourth monthly fee statement.	0.80	304.00
S. Korchinski	11/15/22	Revise draft of fourth monthly fee statement based upon final bill.	2.10	798.00
A. V. Alfano	11/17/22	Review and revise monthly fee statement (.9); email to S. Korchinski re: same (.3).	1.20	999.60
A. V. Alfano	11/18/22	Review/revise monthly fee statement (.2); emails with S. Korchinski and S. Greenspan re: same (.2).	0.40	333.20
S. Korchinski	11/18/22	Review and revise fourth monthly fee statement.	0.40	152.00
A. V. Alfano	11/21/22	Propose changes to draft fourth monthly fee statement (.3); review revised fourth monthly fee statement (.3); emails with S. Korchinski and S. Greenspan re: fee statement (.3).	0.90	749.70
S. Korchinski	11/21/22	Revise and finalize draft fourth monthly fee statement for filing.	1.30	494.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
Subtotal Task: 705 - Fee/Employment Applications			7.70	\$4,330.30
<u>Task: 707 - Mediation</u>				
S. D. Greenspan	11/01/22	Correspondence with A. Kornberg, M. Levi and J. Weber re: strategy call (.2); conference with PW team and Teneo re: mediation strategy (.2); correspondence with J. Jean re: same (.2); correspondence with A. Kornberg re: reporting settlement negotiation developments/progress to insurers (.2); prepare and revise report to insurers re: progress of settlement negotiations with the Committee (.8); correspondence with Pillsbury team re: revisions to same (.3); correspondence with PW team re: revisions to same and revise same (.2); review Chubb's suggested revisions to joint interest agreement and correspondence with Pillsbury team re: same (.4).	2.50	\$2,360.00
P. He	11/01/22	Review communications between Pillsbury team and PW team re: strategy to inform insurers of mediation, status of negotiations with the Committee, settlement proposals from Committee and Madison, demand insurers' contribution, and assignment of policy benefits.	0.50	338.00
J. D. Jean	11/01/22	Review and revise correspondence to insurers re: settlement (.4); review and respond to emails with S. Greenspan re: strategy and coverage/defense issues (.3); confer with S. Greenspan re: next steps for next three months (.3); confer re: bad faith retention of rights and assignments (.3).	1.30	1,735.50
J. D. Jean	11/04/22	Review and revise bad faith letter to Chubb (.3); confer with S. Greenspan and B. Fleishman re: same (.3); confer re: scope of work (.3).	0.90	1,201.50

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	11/09/22	Correspondence with PW team and J. Jean re: results of DIP hearing, the Committee's latest proposal and re: settlement strategy and insurer communications (.6); review the Committee's latest proposal (.3); correspondence with insurers and insurer counsel re: update on the Committee's latest counterproposal (.7).	1.60	1,510.40
J. D. Jean	11/09/22	Review counter demand (.3); review emails re: same (.3); emails with S. Greenspan re: informing insurers (.3).	0.90	1,201.50
S. D. Greenspan	11/10/22	Correspondence with PW team and J. Jean re: settlement strategy (.4); correspondence with M. Plevin, counsel for Chubb re: participation in drafting of reorganization plan documents (.3).	0.70	660.80
J. D. Jean	11/11/22	Review and respond to emails re: coverage (.3); review emails re: Chubb inability to comment on settlement terms and confer with S. Greenspan re: same (.4).	0.70	934.50
S. D. Greenspan	11/15/22	Confer with J. Jean re: settlement and correspondence issues.	0.30	283.20
J. D. Jean	11/15/22	Confer with S. Greenspan re: settlement and correspondence issues.	0.30	400.50
S. D. Greenspan	11/16/22	Conference with M. Levi re: preparation for call with the insurers and prepare for same (.3); conference with the insurers re: Madison's intended settlement offer to the Committee (.4); correspondence with insurers requesting consent to settle or waiver of consent to settle (.4); conference with J. Jean re: draft email to insurers re: demand (.3).	1.40	1,321.60
J. D. Jean	11/16/22	Review and revise email to insurers re: demand (.3); confer with S. Greenspan re: same (.3); confer re: terms of settlement and assignment (.3).	0.90	1,201.50
S. D. Greenspan	11/20/22	Emails with J. Jean re: L. Klein correspondence.	0.20	188.80
J. D. Jean	11/20/22	Review L. Klein correspondence and emails with S. Greenspan re: same.	0.40	534.00

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Michael Kosnitzky

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	11/22/22	Correspondence with insurer counsel re: Committee's last and final offer.	0.30	283.20
S. D. Greenspan	11/23/22	Correspondence with L. Klein, counsel for Chubb re: his demand for a term sheet from the Committee and with PW team re: response to same.	0.30	283.20
J. D. Jean	11/23/22	Review correspondence and proof of claim by Chubb (.4); confer with S. Greenspan and B. Fleishman re: same (.4).	0.80	1,068.00
S. D. Greenspan	11/28/22	Correspondence with insurers and insurer counsel notifying them of the Wednesday call to consult on Madison's response to the Committee's settlement offer and with PW team re: preparation of same (.9); review final term sheet of the proposed settlement with the Committee (.3); correspondence with insurers and insurer counsel re: same in advance of tomorrow's call (.2).	1.40	1,321.60
S. D. Greenspan	11/28/22	Prepare letter to L. Klein responding to his email accusing Madison of lack of cooperation in defense, settlement and mediation (3.8); correspondence with PW team and Pillsbury team re: revisions to same (.6).	4.40	4,153.60
J. D. Jean	11/28/22	Review and revise response to L. Klein on behalf of Chubb and re: proofs of claim (.4); review comments from PW team (.2); review correspondence (.2).	0.80	1,068.00
S. D. Greenspan	11/29/22	Correspondence with insurers re: final term sheet of proposed settlement with the Committee and correspondence with PW team re: same (.4); correspondence with M. Levi re: proposed settlement with the Committee (.2).	0.60	566.40

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Michael Kosnitzky

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	11/30/22	Conference with insurers, insurer counsel and PW team re: proposed terms of final settlement with the Committee (.4); prepare and revise correspondence to insurers and insurer counsel documenting the consultation conference, demanding they honor their obligations under the policies to Madison and requesting they consent to the settlement or they waive the consent to settlement provisions in their policies (1.4).	1.80	1,699.20
Subtotal Task: 707 - Mediation			23.00	\$24,315.00
<u>Task: 708 - Claims Administration and Objections</u>				
K. Woodcock	11/02/22	Research re: duty to investigate (2.6); conferences re: Alan Gray audit reports (.8); conference re: rolling total of number of claimants (.4); draft and edit letter to Chubb re: bad faith conduct - Alan Gray reductions; research citations, total total number of claims (3.1); correspondence with P. He re: CVA actions and strategy for preparing Chubb bad faith letter (.4).	7.30	\$4,409.20
Subtotal Task: 708 - Claims Administration and Objections			7.30	\$4,409.20
Total:			86.10	\$ 72,154.60
Time Summary By Task				
<u>Task</u>			<u>Hours</u>	<u>Amount</u>
701 - Case Administration			1.90	1,985.70
702 - Asset Analysis and Recovery			46.20	37,114.40
705 - Fee/Employment Applications			7.70	4,330.30
707 - Mediation			23.00	24,315.00
708 - Claims Administration and Objections			7.30	4,409.20
Total			86.10	\$ 72,154.60

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Matter No: 0000002
Michael Kosnitzky

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Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
P. M. Gillon	1.70	\$1,097.00	\$1,864.90
J. D. Jean	8.70	1,335.00	11,614.50
Subtotal	10.40		\$13,479.40
Senior Counsel			
S. D. Greenspan	34.80	\$944.00	\$32,851.20
Associate			
K. Woodcock	7.50	\$604.00	\$4,530.00
P. He	24.40	676.00	16,494.40
Subtotal	31.90		\$21,024.40
Senior Associate			
A. V. Alfano	3.10	\$833.00	\$2,582.30
Paralegal			
A. Iniguez	1.30	\$361.00	\$469.30
S. Korchinski	4.60	380.00	1,748.00
Subtotal	5.90		\$2,217.30
Total	86.10		\$72,154.60

Disbursements Incurred

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
11/02/22	Task E106 - Computer Research	Summary	\$1,354.50
Total Disbursements:			\$1,354.50

Disbursement Summary

<u>Type</u>	<u>Amount</u>
Computer Research	1,354.50
Total:	\$1,354.50



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

December 6, 2022
Invoice No. 8506346
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Matter Number	Services	Disbursements	Less Amount	Balance Due
			Applied	
0000002	\$ 72,154.60	\$ 1,354.50	\$ 8,724.38	\$ 64,784.72
Total This Invoice:	\$ 72,154.60	\$ 1,354.50	\$ 8,724.38	\$ 64,784.72

Prior Invoices Outstanding

Invoice Number	Date	Invoice Amount	Payments/ Adjustments	Total Prior Outstanding
8488848	07/27/22	\$8,865.30	\$7,114.32	\$1,750.98
8488135	08/31/22	121,608.83	98,181.67	23,427.16
8492222	09/19/22	116,992.93	93,660.39	23,332.54
8496584	10/13/22	124,267.07	99,942.39	24,324.68
8502959	11/15/22	374,999.00	0.00	374,999.00
Total Prior Outstanding		\$746,733.13	\$298,898.77	\$447,834.36
Total Amount Outstanding				\$512,619.08



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

January 13, 2023
Invoice No. 8513483
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through December 31, 2022

Matter Name	Services	Disbursements	Balance Due
Insurance Recovery	\$ 98,914.80	\$ 0.00	\$ 98,914.80
Total This Invoice:	\$ 98,914.80	\$ 0.00	\$ 98,914.80

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Prior Invoices Outstanding

Invoice Number	Date	Invoice Amount	Payments/ Adjustments	Total Prior Outstanding
8488848	07/27/22	\$8,865.30	\$7,114.32	\$1,750.98
8488135	08/31/22	121,608.83	98,181.67	23,427.16
8492222	09/19/22	116,992.93	93,660.39	23,332.54
8496584	10/13/22	124,267.07	99,942.39	24,324.68
8502959	11/15/22	374,999.00	300,054.81	74,944.19
8506346	12/06/22	73,509.10	8,724.38	64,784.72
Total Prior Outstanding		\$820,242.23	\$607,677.96	\$212,564.27
Total Amount Outstanding				\$311,479.07

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

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Michael Kosnitzky

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Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through December 31, 2022

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
S. Korchinski	12/07/22	Revise document collection to include recent correspondence.	2.60	\$1,040.00
S. Korchinski	12/13/22	Revise document collection to include recent correspondence and court filings.	2.40	960.00
S. Korchinski	12/15/22	Revise document collection to include recent correspondence and court filings.	2.80	1,120.00
S. Korchinski	12/19/22	Revise document collection to include recent correspondence and court filings.	0.20	80.00
S. Korchinski	12/28/22	Revise document collection to include recent correspondence and court filings.	1.60	640.00
S. Korchinski	12/30/22	Revise document collection to include recent correspondence and court filings.	0.80	320.00
Subtotal Task: 701 - Case Administration			10.40	\$4,160.00

Task: 702 - Asset Analysis and Recovery

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/01/22	Review AIG disclaimer letter under National Union policy with sexual abuse exclusion (.2); revise coverage position letter (.8); correspondence with Pillsbury and PW teams re: response to Chubb's proof of claim for recoupment of defense costs in uninsured periods (.7); review and analyze Chubb's proofs of claim (.4); review the Committee's letter to SiriusPoint (.2); review and analyze letter from J. Bullen of Allianz/Jefferson propounding Requests for Information and re: further coverage position on its agreement to defense and strategize re: response (.4); correspondence with J. Dold and B. Baker re: scheduling meeting re: response to same (.2); prepare for and attend conference with P. Gillion, J. Weber and M. Levi re: insurance issues in the reorganization plan (1.4).	4.30	\$4,059.20
S. D. Greenspan	12/02/22	Review correspondence from the Committee to SiriusPoint (.2); review draft proposed public communications materials re: settlement and reorganization plan (.4); review and revise coverage correspondence (2.1).	2.70	2,548.80
S. D. Greenspan	12/05/22	Review and analyze three new coverage position letters from AIG containing request for information and strategize re: response (1.6); correspondence with PW team, J. Dold and B. Baker re: same and re: response to same (.6).	2.20	2,076.80
S. D. Greenspan	12/06/22	Prepare for and attend telephone conference with J. Dold, B. Baker and PW team re: response to insurer information requests (1.4); correspondence with J. Jean, PW team, B. Baker and J. Dold re: response to AIG requests for information (.3); correspondence with A. Iniguez re: gathering information in response to Allianz's request for information (.2); prepare responses to Jefferson/Allianz RFIs (1.3).	3.20	3,020.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/09/22	Review and analyze letter from K. Moran, claim handler for Swiss Re requesting information and strategize re: response.	0.60	566.40
S. D. Greenspan	12/13/22	Correspondence with A. Kornberg, B. Baker and client re: search for evidence of additional insurance policies (.2); confer with J. Jean re: settlement talks and insurer responses (.4).	0.60	566.40
S. D. Greenspan	12/14/22	Review and revise coverage correspondence.	2.20	2,076.80
S. D. Greenspan	12/16/22	Revise draft letter to Swiss Re responding its letter propounding RFIs to Madison (.9); correspondence with PW team, Pillsbury team and B. Baker re: same (.2); confer with J. Jean re: settlement and insurers (.2); revise draft letter to Gen Re responding its letter propounding RFIs to Madison (.6); correspondence with PW team, Pillsbury team and B. Baker re: same (.2).	2.10	1,982.40
P. He	12/16/22	Draft letter to Westport re: response to information request, CVA Actions, bankruptcy, mediation status, evidence of policies and insurance coverage correspondences.	2.90	1,960.40
S. D. Greenspan	12/17/22	Correspondence/confer with J. Jean and PW team re: response to email from AIG's coverage counsel re: policy information.	0.20	188.80
S. D. Greenspan	12/18/22	Correspondence with PW team re: review of and revisions to draft responses to insurer correspondence from Swiss Re and Gen Re and revise same (.7); correspondence with B. Baker re: same and revise same (.4).	1.10	1,038.40

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/19/22	Correspondence with M. Levi re: factual information needed for response to AIG email (.2); prepare draft correspondence to insurers responding to their request for an evaluation by defense counsel of the CVA Claims (.6); conference with J. Jean re: same (.3); review correspondence from L. Klein, counsel for Chubb, requesting an analysis by defense counsel of the CVA claims and the production of documents and prepare response (.9); correspondence with B. Baker and PW team re: response to L. Klein email and revisions to same (.8); review and analyze Debevoise & Plimpton report commissioned and publicly released by Rockefeller University (.3); revise and finalize email to N. Valenza-Frost, counsel for AIG, responding to her email claiming a lack of information from which to make an informed decision concerning the CVA Claims (.3); review correspondence from Chubb and attached Alan Gray audit (.3); correspondence with B. Baker re: response to same (.2); review correspondence from G. Seligman, counsel for Gen Re claiming lack of access to the mediation data room and prepare correspondence in response and correspondence with M. Levi re: same (.3).	4.20	3,964.80
S. D. Greenspan	12/20/22	Telephone call with K. Moran of Swiss Re re: facts of claim (.4); correspondence with and review suggested revisions from PW team to draft email to L. Klein responding to his email (.3); correspondence with and review suggested revisions from B. Baker to draft email to L. Klein responding to his email (.3); revise email to L. Klein responding to his email (.2); correspondence with G. Seligman re: access to mediation data room (.2).	1.40	1,321.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/23/22	Review and analyze letter from Mt. Vernon's coverage counsel refusing to accept Madison's tender of the CVA Actions on behalf of Mt. Vernon on the grounds that Mt. Vernon cannot locate evidence that it issued policies to Madison and refusing to accept the secondary evidence provided by Madison Square as sufficient proof of the existence of the Mt. Vernon policies and correspondence with client, PW team and Pillsbury team re: same.	0.30	283.20
S. D. Greenspan	12/29/22	Prepare correspondence to Chubb claim handler responding to his email claiming that Madison never provided him with defense counsel invoices from 20 CVA claims (.5); correspondence with S. Korchinski re: same (.2); conference with J. Jean re: defense expenses (.2).	0.90	849.60
S. Korchinski	12/29/22	Review invoices submitted to Chubb for reimbursement in response to their requests for invoices for 20 specific matters (.4); draft instructions for searching FK catchall matter for time entries for each matter (.3).	0.70	280.00
S. D. Greenspan	12/30/22	Review correspondence from L. Klein, counsel to Chubb, re: various settlement and coverage issues and strategize re: response to same (.4); correspondence with PW and Pillsbury teams re: response to same and re: response to document request by Klein (.4).	0.80	755.20
Subtotal Task: 702 - Asset Analysis and Recovery			30.40	\$27,539.60

Task: 705 - Fee/Employment Applications

S. D. Greenspan	12/05/22	Correspondence with M. Levi re: questions for preparation of interim fee application.	0.20	\$188.80
S. D. Greenspan	12/06/22	Correspondence with M. Levi re: questions for preparation of interim fee application.	0.20	188.80

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/07/22	Correspondence with M. Levi re: questions for preparation of interim fee application.	0.20	188.80
S. D. Greenspan	12/14/22	Correspondence with S. Hasan re: preparation of and revisions to draft interim fee application (.4); review and approve proposed final version of interim fee application with PW revisions (.5).	0.90	849.60
Subtotal Task: 705 - Fee/Employment Applications			1.50	\$1,416.00
<u>Task: 707 - Mediation</u>				
S. D. Greenspan	12/01/22	Review insurer correspondence re: settlement negotiations and mediation process and prepare correspondence to insurers in response (3.6); correspondence with Pillsbury, PW and FK teams re: same (2.2); confer with J. Jean re: coverage correspondence (.2); correspondence with Pillsbury team re: preparation of defense cost payment demand to Chubb (.2); conference with PW team re: affirmative claims against Rockefeller University (.3); review and analyze term sheet and correspondence re: same (.3); correspondence with PW team re: informational call with insurers (.2); correspondence with Pillsbury and PW teams re: insurance claim and reorganization plan (1.9).	8.90	\$8,401.60
J. D. Jean	12/01/22	Review and revise coverage correspondence (.7); confer with S. Greenspan re: same (.2).	0.90	1,201.50
S. D. Greenspan	12/02/22	Correspondence with PW and Pillsbury teams and B. Baker re: draft responses to correspondence from insurers refusing to consent to the proposed settlement between Madison and the Committee (1.2); revise correspondence responding to insurer correspondence re: same (1.7).	2.90	2,737.60

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/03/22	Correspondence with B. Baker re: revisions to draft responses to AIG, Chubb and Gen Re coverage counsel re: insurers' refusal to consent to settlement with the Committee (.6); revise responses to correspondence from AIG, Chubb and Gen Re's coverage counsel refusing to consent to the settlement (.5).	1.10	1,038.40
S. D. Greenspan	12/04/22	Revise and finalize correspondence to L. Klein responding to his correspondence re: Chubb's refusal to consent to the settlement between the Committee and Madison and responding to various statements in his correspondence (.4); correspondence with PW team and B. Baker re: response to insurer request for a valuation by FK of the CVA claims (.3); revise and finalize correspondence to AIG's coverage counsel responding to her correspondence re: AIG's refusal to consent to the settlement between the Committee and Madison and responding to various statements in his correspondence (.3); revise and finalize correspondence to Gen Re's coverage counsel responding to her correspondence re: Gen Re's refusal to consent to the settlement between the Committee and Madison and responding to various statements in his correspondence (.4).	1.40	1,321.60
S. D. Greenspan	12/05/22	Correspondence with J. Jean, PW team and B. Baker re: response to insurers' request for an evaluation of the CVA claims by FK.	0.40	377.60
J. D. Jean	12/05/22	Review and respond to emails re: insurer defense obligations (.3); review coverage correspondence (.3); confer with S. Greenspan re: same (.3); review settlement-related issues (.4).	1.30	1,735.50
J. D. Jean	12/06/22	Confer with S. Greenspan re: response to insurers and preservation of rights (.3); review emails with S. Greenspan and PW team (.4).	0.70	934.50

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	12/07/22	Emails re: insurers' requests and Committee's requests for privileged information (.3); confer with B. Fleishman and S. Greenspan re: response and strategy re: same (.3).	0.60	801.00
J. D. Jean	12/08/22	Review and revise emails re: mechanics of privilege review (.4); confer with S. Greenspan re: privilege issues (.3).	0.70	934.50
J. D. Jean	12/12/22	Confer with S. Greenspan re: Committee response (.3); confer re: insurer positions and transition to Committee (.3).	0.60	801.00
J. D. Jean	12/13/22	Confer with S. Greenspan re: settlement talks and insurer responses.	0.40	534.00
J. D. Jean	12/15/22	Confer with S. Greenspan re: settlement and insurers.	0.40	534.00
J. D. Jean	12/16/22	Confer with S. Greenspan re: settlement and insurers.	0.20	267.00
J. D. Jean	12/17/22	Review emails re: comments to draft letter to insurers (.2); confer with S. Greenspan re: same (.2).	0.40	534.00
J. D. Jean	12/19/22	Review emails re: plan of reorganization and review plan of reorganization re: insurance issues (.4); review email to insurers and confer with S. Greenspan re: same (.3); review L. Klein email and response (.3).	1.00	1,335.00
J. D. Jean	12/20/22	Review L. Klein correspondence (.4); review S. Greenspan response re: same (.4).	0.80	1,068.00
J. D. Jean	12/21/22	Review emails re: settlement and coverage correspondence with L. Klein.	0.30	400.50
J. D. Jean	12/27/22	Review communications re: coverage and Madison submissions.	0.60	801.00
J. D. Jean	12/28/22	Confer re: responses to requests and strategy re: restructuring.	0.60	801.00
J. D. Jean	12/29/22	Confer with S. Greenspan re: defense expenses (.2); review emails re: insurer defense responses (.3); confer re: response to same (.2).	0.70	934.50

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
Subtotal Task: 707 - Mediation			24.90	\$27,493.80

Task: 708 - Claims Administration and Objections

S. D. Greenspan	12/01/22	Correspondence with PW team re: abuse proofs of claim.	0.20	\$188.80
Subtotal Task: 708 - Claims Administration and Objections			0.20	\$188.80

Task: 709 - Plan and Disclosure Statement

P. M. Gillon	12/01/22	Review draft plan and insurance terms (.7); attend call with PW and S. Greenspan to review insurance terms of draft reorganization plan and potential objections by carriers to assignment (1.1).	1.80	\$1,974.60
S. D. Greenspan	12/01/22	Prepare for (including review of draft reorganization plan and Chubb proofs of claim) and attend conference with P. Gillon, J. Weber and M. Levi re: insurance issues in the reorganization plan (2.4); correspondence with M. Levi and J. Weber in connection with same (.2).	2.60	2,454.40
P. M. Gillon	12/02/22	Review and analyze issues re: draft plan of reorganization and insurance implications.	1.30	1,426.10
S. D. Greenspan	12/02/22	Review and analyze insurance and discovery provisions of Takata reorganization plan in connection with preparation of Madison plan (.7); review and analyze Federal and Century proofs of claim and strategize re: response to same in the reorganization plan and re: discharge of certain claims in the plan vs. preserving plan (1.6); correspondence with PW and Pillsbury teams re: insurer communication re: draft Plan (.2).	2.50	2,360.00
P. M. Gillon	12/05/22	Review draft reorganization plan and insurance provisions (.7); communications with PW re: same (.3).	1.00	1,097.00

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/07/22	Correspondence with PW team and Pillsbury team re: handling/review of Madison's privileged documents prior to turning them over to the Compensation Trust post-confirmation of a Plan.	0.40	377.60
P. M. Gillon	12/08/22	Review draft reorganization plan.	0.50	548.50
S. D. Greenspan	12/08/22	Review and analyze draft reorganization plan, including with respect to insurance and discovery provisions, for potential revisions (2.3); correspondence with PW team and Pillsbury team re: handling/review of Madison's privileged documents prior to turning them over to the Compensation Trust post-confirmation of a plan and re: drafting plan language to reflect same (.8); strategize re: privilege review methods to ensure preservation of privilege and protection of insurance rights (.3); confer with J. Jean re: privilege issues (.3).	3.70	3,492.80
S. D. Greenspan	12/12/22	Review and analyze procedures in BSA Plan for review and treatment of privileged documents and summary of same for potential application to Madison Plan (.3); correspondence with PW, Pillsbury and FK teams re: same and re: strategy meeting in connection with same (.3); confer with J. Jean re: response by Unsecured Creditors' Committee (.3).	0.90	849.60
S. D. Greenspan	12/13/22	Correspondence with PW, Pillsbury and FK teams re: privilege review and privileged document handling in Plan.	0.20	188.80
S. D. Greenspan	12/14/22	Correspondence with PW and FK teams re: strategy meeting concerning privilege review issue in Plan.	0.20	188.80
S. D. Greenspan	12/15/22	Correspondence with PW and FK teams re: strategy meeting concerning privilege review issue in Plan.	0.20	188.80

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

January 13, 2023
Invoice No. 8513483
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/16/22	Conference with PW and FK teams re: privilege document review issues and document production issues and selection of trustee issues in the draft Reorganization Plan (.6); correspondence with PW and Pillsbury teams re: insurer communication (.3).	0.90	849.60
S. D. Greenspan	12/18/22	Correspondence with Pillsbury team re: insurer communication re: Plan.	0.20	188.80
P. M. Gillon	12/19/22	Review and analyze disclosure statement (.8); confer with S. Greenspan re: strategy (.2).	1.00	1,097.00
S. D. Greenspan	12/19/22	Correspondence with PW and Pillsbury teams re: communication of draft reorganization plan to insurers (.2); confer with P. Gillon re: strategy for same (.2).	0.40	377.60
S. D. Greenspan	12/20/22	Review correspondence from M. Levi re: draft disclosure statement and review draft disclosure statement re: insurance issues.	1.20	1,132.80
P. M. Gillon	12/21/22	Review/revise draft reorganization plan and disclosure statement (3.9); correspondence with PW re: D&O and exoneration issues and other matters (.3).	4.20	4,607.40
S. D. Greenspan	12/21/22	Review draft reorganization plan for insurance issues (1.4); correspondence with M. Levi re: same (.2); review P. Gillon's proposed revisions to the reorganization plan re: insurance issues (.4); correspondence with P. Gillon and PW team re: same (.2); correspondence with Pillsbury team and M. Levi re: review of factual information related to insurance issues in the draft disclosure statement (.2).	2.40	2,265.60
J. D. Jean	12/21/22	Review emails re: insurance provisions of draft reorganization plan.	0.20	267.00
P. M. Gillon	12/22/22	Review/revise draft reorganization plan and disclosure statement (1.7); correspondence with PW re: exoneration and other issues (.3).	2.00	2,194.00

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

January 13, 2023
Invoice No. 8513483
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/22/22	Review proposed revisions to the insurance portions of the draft disclosure statement and revise statement (1.3); correspondence with PW team re: same (.2); review further revisions to the draft reorganization plan (.6); correspondence with PW team re: same (.2).	2.30	2,171.20
P. M. Gillon	12/27/22	Review and analyze exoneration issue.	1.00	1,097.00
S. D. Greenspan	12/27/22	Correspondence with P. Gillon re: exoneration clause research for the Plan (.2); correspondence with J. Dold re: same (.4).	0.60	566.40
J. N. Vazquez	12/27/22	Review reorganization plan and Madison materials to determine what is needed to mitigate lack of coverage for claims not insured by the operative policies.	2.10	1,304.10
P. M. Gillon	12/28/22	Review and analyze mediator proposal and settlement implications (.6); correspondence with S. Greenspan and PW team re: same (.2); analyze and address exoneration issue (.4).	1.20	1,316.40
S. D. Greenspan	12/28/22	Review mediator's report and correspondence with PW team and P. Gillon re: same (.2); review draft update to the NYS Charities Bureau on the chapter 11 case and correspondence with PW team re: same (.3).	0.50	472.00
S. D. Greenspan	12/29/22	Review correspondence with client and PW team re: proposed revisions to draft update to the NYS Charities Bureau on the chapter 11 case.	0.20	188.80
J. N. Vazquez	12/29/22	Review and analyze materials and revise draft of exculpation provision in draft reorganization plan to encompass claims not covered by operative policy.	1.90	1,179.90
P. M. Gillon	12/30/22	Review/revise exoneration clause of draft reorganization plan and forward language to PW.	1.20	1,316.40

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

January 13, 2023
Invoice No. 8513483
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	12/30/22	Review and analyze proposed draft revisions to the Madison reorganization Plan re: the exoneration claim and re: protection of the Madison Board for pre-petition conduct.	0.40	377.60
Subtotal Task: 709 - Plan and Disclosure Statement			39.20	\$38,116.60
Total:			106.60	\$ 98,914.80

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	10.40	4,160.00
702 - Asset Analysis and Recovery	30.40	27,539.60
705 - Fee/Employment Applications	1.50	1,416.00
707 - Mediation	24.90	27,493.80
708 - Claims Administration and Objections	0.20	188.80
709 - Plan and Disclosure Statement	39.20	38,116.60
Total	106.60	\$ 98,914.80

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
P. M. Gillon	15.20	\$1,097.00	\$16,674.40
J. D. Jean	10.40	1,335.00	13,884.00
Subtotal	25.60		\$30,558.40
Senior Counsel			
S. D. Greenspan	63.00	\$944.00	\$59,472.00
Associate			
P. He	2.90	\$676.00	\$1,960.40
J. N. Vazquez	4.00	621.00	2,484.00
Subtotal	6.90		\$4,444.40
Paralegal			
S. Korchinski	11.10	\$400.00	\$4,440.00
Total	106.60		\$98,914.80



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

February 7, 2023
Invoice No. 8516581
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through January 31, 2023

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 41,992.50	\$ 20.30	\$ 42,012.80
Total This Invoice:	\$ 41,992.50	\$ 20.30	\$ 42,012.80

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

February 7, 2023
 Invoice No. 8516581
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Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through January 31, 2023

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
S. Korchinski	01/09/23	Revise document collection to include recent correspondence and court filings.	0.20	\$80.00
S. Korchinski	01/24/23	Revise document collection to include recent correspondence.	0.40	160.00
S. Korchinski	01/30/23	Revise document collection to include recent correspondence.	0.60	240.00
Subtotal Task: 701 - Case Administration			1.20	\$480.00

Task: 702 - Asset Analysis and Recovery

S. D. Greenspan	01/04/23	Review coverage position letter/requests for information from Allianz.	0.30	\$283.20
S. D. Greenspan	01/10/23	Review coverage correspondence from Chubb and prepare response (1.3); review coverage correspondence from AIG and prepare response (2.8).	4.10	3,870.40
S. D. Greenspan	01/11/23	Correspondence with counsel for Allianz re: access to documents produced by Madison and with Pillsbury team re: response to same; (.3); correspondence with Chubb re: response to Chubb request for information (.4); correspondence with M. Levi re: same (.2).	0.90	849.60
S. D. Greenspan	01/12/23	Correspondence with counsel for Chubb re: response to request for information (.3); confer with J. Jean re: ongoing strategy and correspondence with insurers and the UCC (.3).	0.60	566.40
J. D. Jean	01/12/23	Confer with S. Greenspan re: ongoing strategy and correspondence with insurers and committee.	0.30	400.50

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 Michael Kosnitzky

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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. Korchinski	01/12/23	Review correspondence collection for all correspondence with SiriusPoint, Security Mutual and Puritan Insurance/Swiss Re in preparation for distribution to Chubb (1.2); revise collection with additional correspondence received (.4); review files for prior production to Allianz to comply with request to re-send (.7).	2.30	920.00
S. D. Greenspan	01/17/23	Review and analyze Chubb's letter and attachment paying \$625,000 in Friedman Kaplan defense costs (.3); correspondence with Pillsbury and PW teams re: analysis of same (.9); correspondence with J. Dold re: analysis of same (.9); correspondence with counsel for Chubb re: same (.2); correspondence with J. Dold re: scanning and need to verify wording of Chubb checking paying defense costs and review/analyze Chubb check (.2).	2.50	2,360.00
S. D. Greenspan	01/18/23	Conference with J. Dold re: Chubb defense cost payment.	0.20	188.80
S. D. Greenspan	01/19/23	Correspondence and conference with J. Dold re: Chubb designation of "final payment" of its defense costs check and analyze check (.4); research New York law re: depositing check with reserving of rights under the New York Uniform Commercial Code to avoid an accord and satisfaction (2.8); correspondence with PW team re: response to Chubb's issuance of a "final payment" check without disclosing it in the transmittal letter (.4); prepare correspondence to PW team and Pillsbury team re: results of accord and satisfaction research and re: proposed response to the "full payment" check (.8); correspondence and conference with M. Levi re: differences in UCC versus New York UCC concerning accord and satisfaction (.4).	4.80	4,531.20
J. D. Jean	01/19/23	Emails re: research and analysis re: Chubb payment.	0.60	801.00
S. D. Greenspan	01/23/23	Confer with J. Jean re: Chubb response and payment strategy.	0.30	283.20

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

February 7, 2023
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	01/23/23	Review correspondence (.3); confer with S. Greenspan re: Chubb response and payment strategy (.3).	0.60	801.00
S. D. Greenspan	01/24/23	Confer with J. Jean re: Chubb's "final" payment for FK defense counsel fees and the UCC's attempt to take same (.4); confer with J. Jean re: Chubb payment issues (.2).	0.60	566.40
J. D. Jean	01/24/23	Review comments and strategy re: the Plan and emails re: comments to same (.6); confer with S. Greenspan re: Chubb's payments for defense counsel and Committee's request to take same (.4); review and respond to correspondence from PW Team and S. Greenspan re: Chubb payments (.2); confer with S. Greenspan re: same (.2).	1.40	1,869.00
S. D. Greenspan	01/30/23	Correspondence with Madison re: Chubb final payment check (.2); correspondence with J. Jean re: same and re: UCC position and demands(.3).	0.50	472.00
J. D. Jean	01/30/23	Confer with S. Greenspan re: Chubb reimbursement and committee position/strategy.	0.30	400.50
S. D. Greenspan	01/31/23	Correspondence with PW team re: Chubb defense costs check disposition strategy (.4); conference with M. Levi re: same (.2).	0.60	566.40
Subtotal Task: 702 - Asset Analysis and Recovery			20.90	\$19,729.60
<u>Task: 705 - Fee/Employment Applications</u>				
A. V. Alfano	01/05/23	Emails with S. Korchinski re: monthly fee statement.	0.20	\$166.60
A. V. Alfano	01/17/23	Review December monthly fee statement (.1); propose changes and send to S. Korchinski (.1).	0.20	166.60
S. Korchinski	01/17/23	Draft sixth monthly fee statement for submission to the bankruptcy court.	0.30	120.00
Subtotal Task: 705 - Fee/Employment Applications			0.70	\$453.20

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

February 7, 2023
 Invoice No. 8516581
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 707 - Mediation</u>				
J. D. Jean	01/04/23	Review coverage correspondence and communications with PW team re: document requests and privilege issues re: committee.	0.40	\$534.00
J. D. Jean	01/10/23	Review Chubb correspondence and correspondence with S. Greenspan re: response to same (.6); review response and comment re: same (.4).	1.00	1,335.00
J. D. Jean	01/17/23	Review Chubb correspondence re: \$625,000 payment and strategy re: responding to same and authority for cashing check (.4); confer with S. Greenspan and review correspondence from PW team re: same (.3).	0.70	934.50
J. D. Jean	01/20/23	Review emails and strategy re: Chubb check and "final" payment.	0.60	801.00
J. D. Jean	01/21/23	Confer re: strategy re: Klein and Chubb.	0.20	267.00
Subtotal Task: 707 - Mediation			2.90	\$3,871.50
<u>Task: 709 - Plan and Disclosure Statement</u>				
S. D. Greenspan	01/04/23	Correspondence with PW team re: scope and methodology for privilege review of Madison Square documents turned over to the Compensation Trustee and re: insurer communications.	0.40	\$377.60
S. D. Greenspan	01/18/23	Correspondence with PW team and J. Jean re: communication/presentation of draft Plan and re: treatment by Madison of the \$625,000 Chubb defense cost payment.	0.20	188.80
P. M. Gillon	01/23/23	Review and comment on UCC's edits to draft Plan.	1.80	1,974.60

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

February 7, 2023
Invoice No. 8516581
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	01/23/23	Correspondence with M. Levi re: request to review UCC's proposed revisions to the draft Reorganization Plan (.2); correspondence with P. Gillon and J. Jean re: same and re: potential relevant revisions of UCC to the Reorganization Plan concerning insurance issues (.7); review and analyze UCC's proposed revisions to the Reorganization Plan and prepare correspondence to PW and Pillsbury teams re: same and re: recommended responses to same (1.7); correspondence with P. Gillon and PW team re: scheduling strategy call re: UCC's proposed revisions to the draft Reorganization Plan (.2); review P. Gillon's proposed' s revisions to the UCC's proposed revisions to the Reorganization Plan (.4); correspondence with P. Gillon re: same (.2).	3.40	3,209.60
P. M. Gillon	01/24/23	Review/revise UCC changes to Plan (.4); confer with PW re: same (1.4); prep revisions to insurance-related provisions of draft Plan (.5).	2.30	2,523.10
S. D. Greenspan	01/24/23	Prepare for and attend call with PW re: response to the UCC's proposed revisions to the Reorganization Plan (1.4); review correspondence from M. Levi re: proposed response to the UCC's revisions to the Reorganization Plan (.2).	1.60	1,510.40
S. D. Greenspan	01/25/23	Review proposed revisions/markups to the UCC's proposed revisions to the draft Reorganization Plan (1.4); correspondence with PW team re: same (.4).	1.80	1,699.20
P. M. Gillon	01/26/23	Review Plan revisions and providing comments regarding insurance and related matters.	2.10	2,303.70
S. D. Greenspan	01/26/23	Correspondence with P. Gillon and PW team re: revisions to UCC's revisions to the Reorganization Plan.	0.20	188.80
P. M. Gillon	01/27/23	Communications with PW re: plan revisions and draft response to UCC (.7); review and revise insurance-related provisions (1.7).	2.40	2,632.80

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

February 7, 2023
 Invoice No. 8516581
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
Subtotal Task: 709 - Plan and Disclosure Statement			16.20	\$16,608.60
<u>Task: 711 - Court Hearings</u>				
S. D. Greenspan	01/12/23	Prepare for and attend court hearing on interim fee applications.	0.90	\$849.60
Subtotal Task: 711 - Court Hearings			0.90	\$849.60
Total:			42.80	\$ 41,992.50

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	1.20	480.00
702 - Asset Analysis and Recovery	20.90	19,729.60
705 - Fee/Employment Applications	0.70	453.20
707 - Mediation	2.90	3,871.50
709 - Plan and Disclosure Statement	16.20	16,608.60
711 - Court Hearings	0.90	849.60
Total	42.80	\$ 41,992.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
P. M. Gillon	8.60	\$1,097.00	\$9,434.20
J. D. Jean	6.10	1,335.00	8,143.50
Subtotal	14.70		\$17,577.70
Senior Counsel			
S. D. Greenspan	23.90	\$944.00	\$22,561.60
Senior Associate			
A. V. Alfano	0.40	\$833.00	\$333.20
Paralegal			
S. Korchinski	3.80	\$400.00	\$1,520.00
Total	42.80		\$41,992.50

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

February 7, 2023
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Disbursements Incurred

<u>Date</u>	<u>Type</u>	<u>Description</u>	<u>Amount</u>
12/16/22	Task E101 - Reproductions	Summary	\$20.30
Total Disbursements:			\$20.30

Disbursement Summary

<u>Type</u>	<u>Amount</u>
Reproductions	20.30
Total:	\$20.30

Total Due For Matter 0000002: \$42,012.80



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

March 9, 2023
Invoice No. 8522028
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through February 28, 2023

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 46,277.10	\$ 0.00	\$ 46,277.10
Total This Invoice:	\$ 46,277.10	\$ 0.00	\$ 46,277.10

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

March 9, 2023
Invoice No. 8522028
Page 2

Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through February 28, 2023

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
S. Korchinski	02/22/23	Revise document collection to include recent correspondence and court filings (1.4); review and export correspondence with insurers for Paul Weiss' review (.4).	1.80	\$720.00
Subtotal Task: 701 - Case Administration			1.80	\$720.00
<u>Task: 702 - Asset Analysis and Recovery</u>				
S. D. Greenspan	02/01/23	Correspondence with J. Dold re: Chubb "final payment" check (.2); prepare for and conference with J. Jean re: payment by Chubb of "full payment" check and re: strategy for same (.4).	0.60	\$566.40
J. D. Jean	02/01/23	Review and confer with S. Greenspan re: payment by Chubb issue.	0.30	400.50
S. D. Greenspan	02/06/23	Review correspondence from J. Biondolillo re: payment made of "full payment" check.	0.20	188.80
S. D. Greenspan	02/08/23	Prepare for and attend telephone conference with UCC and PW team re: Plan and Chubb final payment check issues (1.7); correspondence with J. Dold re: providing financial information requested by AIG (.2).	1.90	1,793.60
S. D. Greenspan	02/27/23	Correspondence with PW and Pillsbury teams re: response to Federal's full payment check for FK defense costs and re: attempt to contact counsel for Chubb (.6); strategize re: response to Federal's full payment check (.2).	0.80	755.20
S. D. Greenspan	02/27/23	Prepare responses to outstanding insurer Requests for Information.	4.40	4,153.60

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

March 9, 2023
Invoice No. 8522028
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	02/28/23	Correspondence with PW and Pillsbury teams re: response to Federal's full payment check for FK defense costs and re: attempt to contact counsel for Chubb (.6); strategize re: response to Federal's full payment check (.2); conference with S. Roman, counsel for Chubb re: "full payment" check issue (.2); prepare correspondence to S. Roman seeking clarification re: Chubb's intent in issuing a "full payment" check (1.2); correspondence with J. Dold and PW team re: same (.2).	2.40	2,265.60
Subtotal Task: 702 - Asset Analysis and Recovery			10.60	\$10,123.70
<u>Task: 705 - Fee/Employment Applications</u>				
A. V. Alfano	02/13/23	Review and revise January monthly fee statement received from S. Korchinski (.3); send markup to S. Korchinski (.1).	0.40	\$333.20
S. Korchinski	02/13/23	Draft seventh monthly fee statement.	0.60	240.00
Subtotal Task: 705 - Fee/Employment Applications			1.00	\$573.20
<u>Task: 707 - Mediation</u>				
J. D. Jean	02/27/23	Confer with S. Greenspan re: Fourth Circuit decision re: bankruptcy and insurance (.2); review summary re: same (.3); review emails re: Committee and Chubb check and arguments Committee is making to take the check (.6).	1.10	\$1,468.50
Subtotal Task: 707 - Mediation			1.10	\$1,468.50
<u>Task: 708 - Claims Administration and Objections</u>				
S. Korchinski	02/21/23	Coordinate with Paul Weiss re: insurance correspondence.	0.60	\$240.00

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

March 9, 2023
Invoice No. 8522028
Page 4

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. Korchinski	02/23/23	Review email exported as insurer correspondence prior to forwarding to Paul Weiss in response to request for insurer correspondence since August 1, 2022.	2.60	1,040.00
S. D. Greenspan	02/28/23	Correspondence with J. Weber re: settlement offer and communication of same (.2); correspondence with J. Jean re: same (.3); review and analyze policies' provisions in connection with same (.4).	0.90	849.60
Subtotal Task: 708 - Claims Administration and Objections			4.10	\$2,129.60
<u>Task: 709 - Plan and Disclosure Statement</u>				
P. M. Gillon	02/01/23	Review and analyze draft Plan insurance schedule for insurer review.	0.70	\$767.90
S. D. Greenspan	02/01/23	Telephone conference with M. Levi re: providing insurers with the draft Reorganization Plan (.2); correspondence with UCC re: providing RU with the draft Plan and Disclosure Statement (.3); review and revise draft email to insurers and insurer counsel providing them with the draft Plan and Disclosure Statement (.4).	0.90	849.60
S. D. Greenspan	02/02/23	Prepare for and attend call with the UCC and PW team re: Reorganization Plan (1.7); correspondence with UCC re: scheduling a call that they requested (.2); correspondence with UCC re: accord and satisfaction research to respond to Chubb "final payment" check (.2); correspondence with M. Levi re: results of call with UCC (.2).	2.30	2,171.20
S. D. Greenspan	02/03/23	Correspondence with UCC re: significance of Chubb's payment (.2); review draft objection to RU's Proof of Claim (.4); correspondence with Madison Square team re: same (.2); confer with J. Jean in connection with the foregoing (.3).	1.10	1,038.40
J. D. Jean	02/03/23	Confer with S. Greenspan re: Madison and objection to Rockefeller's proof of claim.	0.30	400.50

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

March 9, 2023
 Invoice No. 8522028
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	02/07/23	Correspondence with counsel for AIG requesting the draft Compensation Trust Documents (.2); correspondence with UCC and with J. Weber and M. Levi re: accord and satisfaction research, money owed by Chubb and whether there were any pre-tender costs (.4).	0.60	566.40
S. D. Greenspan	02/08/23	Correspondence with insurer and insurance counsel re: draft allocation protocol (.2); correspondence with UCC re: scheduling call to discuss Chubb issues (.4); correspondence with UCC re: providing information they requested about cases (.2).	0.80	755.20
S. D. Greenspan	02/10/23	Correspondence with counsel from AIG re: comments to draft Plan, Disclosure Statement and Allocation Protocol (.2); correspondence with J. Jean re: reorganization strategy and re: communications with insurers (.2).	0.40	377.60
J. D. Jean	02/10/23	Strategy re: reorganization and communications with insurers with S. Greenspan.	0.20	267.00
S. D. Greenspan	02/13/23	Correspondence with M. Levi re: status of review of AIG's comments to the Plan, Disclosure Statement and Allocation Protocol.	0.30	283.20
B. J. Coffey	02/14/23	Create list of all potentially applicable insurance policies for reorganization plan.	1.20	530.40
P. M. Gillon	02/14/23	Review AIG comments on plan (.5); review correspondence with S. Greenspan re: same (.2).	0.70	767.90

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

March 9, 2023
Invoice No. 8522028
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	02/14/23	Correspondence with B. Coffey and P. Gillon re: preparation of list of Abuse Policies for the Plan (.2); correspondence with J. Weber and M. Levi re: scope of policies and information to include in the list of Abuse Policies to be transferred to the Compensation Trust (.4); review and analyze AIG's proposed revisions to the Plan, Disclosure Statement and Allocation Protocol and comment on them (2.4); correspondence with P. Gillon re: review of AIG edits (.2); correspondence with J. Weber and M. Levi re: my review of AIG edits to the plan (.4); correspondence with UCC re: AIG comments to Disclosure Statement, Plan and Allocation Protocol (.2).	3.80	3,587.20
B. J. Coffey	02/15/23	Create list of all potentially applicable insurance policies for Reorganization Plan (2.2); conference with M. Pierro at IAG re: accuracy of policy list (.2).	2.40	1,060.80
S. D. Greenspan	02/16/23	Correspondence with UCC and PW team re: refusal of the UCC to consent to Madison Square endorsing the Chubb "final payment" check so that Madison Square can deposit it and prevent and accord and satisfactory.	0.60	566.40

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

March 9, 2023
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	02/21/23	Review and analyze RU's document requests to Madison Square seeking communications with insurers and strategize re: responses (.4); review proposed production of insurance-related documents to RU for responsiveness and relevance (2.8); correspondence with PW team re: privileged/relevance status of certain documents in the proposed production to RU and re: gathering of responsive documents (.3); conference with Pillsbury team re: gathering insurance correspondence for review and then production to RU (.3); review and retrieve personal insurance correspondence with insurers in connection with same (.6); correspondence with S. Korchinski re: same (.2); review and analyze proposed policy Exhibit to the Plan (.7); correspondence with B. Coffey re: preparation and review of same (.2); correspondence with PW team re: same (.2); conference with L. Varga re: response to RU's request for production of documents, privileged status of some responsive documents and re: Madison Square objection to Rockefeller proof of claim (.4); correspondence with L. Varga re: future strategy call (.2).	6.30	5,947.20
S. D. Greenspan	02/22/23	Prepare for and attend conference with PW team re: review of Rockefeller requests for production of insurance information and re: UCC comments to draft Plan re: insurance issues (1.4); review and revise proposed objections to RU's insurance-related discovery requests (1.2); correspondence with PW team re: UCC's latest round of revisions to the Plan and prepare comments/reactions to same (.5); correspondence with M. Levi re: bad faith letter (.2).	3.30	3,115.20

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

March 9, 2023
Invoice No. 8522028
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	02/23/23	Review and analyze UCC's latest round of revisions to the Plan and prepare comments/reactions to same (3.2); review PW issues list in connection with same (.2); correspondence with J. Jean and PW team re: same (.4).	3.80	3,587.20
S. D. Greenspan	02/27/23	Review new Court of Appeals decision re: insurance neutrality and insurers' lack of standing to object to insurance neutral bankruptcy plan and re: lack of duty of cooperation in bankruptcy plan negotiations and correspondence with PW team re: same (.3); correspondence with M. Levi re: preparation, content and communication of the policy schedule to the draft Reorganization Plan of Madison (.2).	0.50	472.00
S. D. Greenspan	02/28/23	Review and analyze Federal's/Century's comments to the proposed bankruptcy plan and Paul Weiss's suggested responses (1.3); outline responses to same (1.4).	2.70	2,548.80
J. D. Jean	02/28/23	Confer with S. Greenspan re: Chubb payment and correspondence with Chubb re: same (.3); review strategy re: responding to Committee (.2); review comments from M. Plevin on behalf of Chubb re: initial comments to draft plan of reorganization (.4); emails re: Rockefeller settlement proposal and confer with S. Greenspan re: informing insurers re: same (.3).	1.20	1,602.00
Subtotal Task: 709 - Plan and Disclosure Statement			34.10	\$31,262.10
Total:			52.70	\$ 46,277.10

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	1.80	720.00
702 - Asset Analysis and Recovery	10.60	10,123.70
705 - Fee/Employment Applications	1.00	573.20
707 - Mediation	1.10	1,468.50
708 - Claims Administration and Objections	4.10	2,129.60
709 - Plan and Disclosure Statement	34.10	31,262.10

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

March 9, 2023
 Invoice No. 8522028
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Total 52.70 \$ 46,277.10

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
P. M. Gillon	1.40	\$1,097.00	\$1,535.80
J. D. Jean	3.10	1,335.00	4,138.50
<i>Subtotal</i>	<i>4.50</i>		<i>\$5,674.30</i>
Senior Counsel			
S. D. Greenspan	38.60	\$944.00	\$36,438.40
Senior Associate			
A. V. Alfano	0.40	\$833.00	\$333.20
Other Attorney			
B. J. Coffey	3.60	\$442.00	\$1,591.20
Paralegal			
S. Korchinski	5.60	\$400.00	\$2,240.00
Total	52.70		\$46,277.10

Total Due For Matter 0000002: \$46,277.10



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

April 11, 2023
Invoice No. 8527064
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through March 31, 2023

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 51,900.10	\$ 0.00	\$ 51,900.10
Total This Invoice:	\$ 51,900.10	\$ 0.00	\$ 51,900.10

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

April 11, 2023
Invoice No. 8527064
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Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through March 31, 2023

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
S. Korchinski	03/23/23	Revise document collection to include recent correspondence and court filings.	0.60	\$240.00
Subtotal Task: 701 - Case Administration			0.60	\$240.00

Task: 702 - Asset Analysis and Recovery

S. D. Greenspan	03/01/23	Review request by the UCC re: secondary evidence of policies (.3); correspondence with M. Pierro re: preparing response to same (.3); correspondence with Pillsbury team re: Chubb deductibles/retentions (.2); review and analyze chart of Chubb deductibles/retentions and strategize re: negotiations with UCC re: Plan in connection with same (.4); correspondence with PW team and client re: RU settlement issues (.2); correspondence with S. Roman re: Chubb's agreement of Madison's non-waiver of rights and no accord and satisfaction if Madison deposits Chubb's \$625K check for defense costs of CVA claims that Chubb had marked as "full payment" (.2); correspondence with PW and Pillsbury team re: analysis of same and re: next steps of Madison with the check and re: recommended course of action (.8); correspondence with UCC re: same (.2); correspondence with PW team re: response to UCC's questions re: Chubb check and correspondence with UCC re: same (.4); prepare draft response to S. Roman email re: Chubb check (.8); correspondence with PW team re: same (.2); correspondence with S. Roman re: same (.2); correspondence with J. Jean re: insurer communications with RU settlement offer and re: Chubb payment (.2); correspondence with J. Weber re: same (.2).	4.60	\$4,342.40
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Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

April 11, 2023
 Invoice No. 8527064
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	03/02/23	Correspondence with insurers re: RU settlement offer (.2); review/approval draft correspondence to insurers re: same and correspondence with PW team re: same (.2).	0.40	377.60
S. Korchinski	03/02/23	Review and organize proof/evidence of policies for distribution to counsel for UCC.	0.60	240.00
S. D. Greenspan	03/03/23	Correspondence with Pillsbury team re: production of policy documentation to UCC.	0.20	188.80
S. Korchinski	03/03/23	Finalize policy evidence documentation (.2); draft email to counsel for UCC forwarding same (.2).	0.40	160.00
S. D. Greenspan	03/06/23	Correspondence with L. Varga re: insurer communications issues re: RU document request.	0.20	188.80
S. D. Greenspan	03/09/23	Telephone conference with UCC re: insurance policy issues (.6); review insurer requests for information and review potentially responsive information/documents (1.6).	2.20	2,076.80
S. D. Greenspan	03/21/23	Correspondence with R. Chiu re: submission of post-petition FK invoices to carriers.	0.20	188.80
S. D. Greenspan	03/22/23	Correspondence with B. Baker re: production of all post-petition FK invoices to Chubb and Allianz.	0.20	188.80
S. D. Greenspan	03/23/23	Review correspondence from S. Korchinski re: report of post-petition FK invoices sent to Chubb and Allianz in connection with sending all post-petition FK invoices to them (.2); correspondence with B. Baker re: production of all post-petition FK invoices to Chubb and Allianz (.3); review post-petition FK invoices for submission (.4); correspondence with S. Korchinski re: instructions for production/submission of same (.2); correspondence with R. Chiu re: submission of post-petition FK invoices to carriers (.2).	1.30	1,227.20
S. Korchinski	03/23/23	Review correspondence for submission of post petition Friedman Kaplan invoices to insurers.	1.90	760.00

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

April 11, 2023
Invoice No. 8527064
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. Korchinski	03/24/23	Review and organize invoices received from Friedman Kaplan in preparation of submitting to Chubb and Allianz for payment (1.4); draft letter to Allianz submitting Friedman Kaplan invoices for payment (1.7)	3.10	1,240.00
S. D. Greenspan	03/27/23	Review and revise correspondence to Chubb re: post-petition FK invoices and demand for payment (1.2); review invoices to produce to Chubb (.4); revise and correspondence to Allianz re: post-petition FK invoices and demand for payment (1.1); review invoices and other documents to produce to Allianz (1.4).	4.10	3,870.40
S. Korchinski	03/27/23	Draft letters to Allianz and Chubb submitting Friedman Kaplan invoices for payment.	2.30	920.00
Subtotal Task: 702 - Asset Analysis and Recovery			21.70	\$15,969.60

Task: 705 - Fee/Employment Applications

A. V. Alfano	03/07/23	Follow up with S. Korchinski re upcoming deadlines.	0.20	\$166.60
S. Korchinski	03/10/23	Draft eighth monthly fee statement.	0.40	160.00
A. V. Alfano	03/12/23	Review and revise February monthly fee statement (0.3); send to Pillsbury team (0.1).	0.40	333.20
Subtotal Task: 705 - Fee/Employment Applications			1.00	\$659.80

Task: 707 - Mediation

J. D. Jean	03/01/23	Emails re: Chubb payment and correspondence and re: RU settlement offer (.2); confer with S. Greenspan re: same (.2).	0.40	\$534.00
J. D. Jean	03/27/23	Review correspondence and confer with S. Greenspan re: Chubb and restructuring issues.	0.30	400.50
J. D. Jean	03/29/23	Review emails re: Chubb and hearings.	0.20	267.00
Subtotal Task: 707 - Mediation			0.90	\$1,201.50

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

April 11, 2023
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 709 - Plan and Disclosure Statement</u>				
S. D. Greenspan	03/01/23	Prepare for and attend conference with PW team re: response to Chubb's comments and objections to the draft Reorganization Plan (1.3); review and analyze Chubb's comments and objections to the Plan (.8); correspondence with PW team in connection with the foregoing (.4); prepare comments to Chubb's proposed revisions to the Plan (1.2); correspondence with B. Baker: re: RU claims against Madison, if any, in the underlying CVA actions (.2); correspondence with PW team and UCC re: Plan negotiations and questions re: same (.6); correspondence with UCC re: insurance call (.2).	4.70	\$4,436.80
B. J. Coffey	03/02/23	Compile evidence of general, umbrella, and management liability policies to transfer to client in connection with preparation of Plan/Disclosure Statement.	2.60	1,149.20

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

April 11, 2023
Invoice No. 8527064
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	03/02/23	Correspondence with I. Nastir and J. Weber re: insurance issues call (.2); prepare for and attend telephone conference with I. Nastir re: SIR/Deductible Issues (.6); correspondence with I. Nastir re: SIR/Deductible issues (.4); review revised Plan with PW revisions in response to Chubb's proposed revisions to the Plan (1.2); correspondence with PW team re: same (.3); correspondence with M. Pierro re: response to policy search inquiry of UCC and re: production of policy documents (.4); correspondence with Pillsbury team re: preparation of response to UCC policy search/secondary evidence inquiry (.4); correspondence with PW team re: same and re: responses to UCC (.4); correspondence with G. Brown of UCC re: response to UCC policy search/secondary evidence inquiry (.3); correspondence with client re: UCC policy search inquiry (.7); correspondence with PW team re: exposure to deductibles/retentions, if any and re: impact on negotiations with the UCC (.3); correspondence with UCC re: revised Plan and DS motion (.2); correspondence with PW team re: Chubb response to email re: non-waiver of rights from depositing Chubb check (.2); correspondence with J. Dold re: instructions re: deposit of Chubb check (.2); correspondence with PW team re: IAG policy search efforts and re: negotiation status with UCC over the Plan (.4); correspondence with T. Walker and review documents re: policy search (1.1).	7.30	6,891.20
B. J. Coffey	03/03/23	Compile evidence of general, umbrella, and management liability policies to transfer to client.	0.90	397.80

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

April 11, 2023
Invoice No. 8527064
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	03/03/23	Prepare for and attend conference with UCC and PW team re: bankruptcy plan negotiations (.9); review and analyze Paul Weiss revisions to the Plan in response to the insurers' and the UCC's proposed revisions and revise same (2.4); prepare for and attend conference with PW team re: same (.9); correspondence with PW team re: Pillsbury revisions to Plan (.2); review proposed endorsement to Chubb check and correspondence with J. Dold re: deposit (.2); correspondence with UCC and PW team re: RU offer (.2); correspondence with PW team re: IAG policy search efforts and re: negotiation status with UCC over the Plan (.3).	5.10	4,814.40
S. D. Greenspan	03/06/23	Review proposed production of secondary evidence (.8); correspondence with UCC re: production of secondary evidence (.2); correspondence with B. Baker and PW team re: same (.2); correspondence with PW and R. Chiu re: various issues concerning Madison Disclosure Statement (.4); correspondence with UCC re: revised Plan (.2); correspondence with PW team re: circulation of draft Plan to the insurers and re: confirmation timeline (.2); correspondence with insurers re: revised draft Plan and Disclosure Statement (.2); correspondence with M. Levi re: preparation of same (.2).	2.40	2,265.60
S. D. Greenspan	03/07/23	Correspondence with UCC and Pillsbury team re: production of secondary evidence (.2); correspondence with UCC re: Plan (.2).	0.40	377.60
S. D. Greenspan	03/08/23	Correspondence with J. Freeman of UCC and S. Korchinski re: production of secondary evidence (.2); conference with J. Freeman re: same (.4); correspondence with UCC re: Plan (.2); correspondence with PW team and with J. Dold re: UCC request for policy search information and re: proposed response (.6); conference with PW team re: same (.2); correspondence with UCC and PW team re: negotiations re: draft Plan (.4); review UCC's further comments to the draft Plan and formulate responses (.6).	2.60	2,454.40

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Matter No: 0000002
Michael Kosnitzky

April 11, 2023
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
P. M. Gillon	03/09/23	Review draft reorganization plan and comments to same from insurers.	0.60	658.20
S. D. Greenspan	03/09/23	Correspondence with PW and R. Chiu re: various issues concerning Madison Disclosure Statement (.2); review and analyze AIG's proposed revisions to the draft Plan and Disclosure Statement (.9); correspondence with AIG re: same (.2); correspondence with PW team re: recommended response to specific revision to the draft Plan proposed by the UCC (.4).	1.70	1,604.80
S. D. Greenspan	03/10/23	Review and analyze additional revisions to Plan proposed by Chubb and review Chubb's questions re: same and strategize re: responses to same (.8); correspondence with PW team re: recommendations for proposed responses and objections to RU's document request (.3).	1.10	1,038.40
S. D. Greenspan	03/13/23	Review Chubb's proposed revisions to the Disclosure Statement and strategize re: response (.6); correspondence with Chubb re: same and re: Madison's response to comments by Chubb to the Plan (.3).	0.90	849.60
S. D. Greenspan	03/14/23	Correspondence with counsel for Chubb re: Chubb's request for insurer notification of post-confirmation tort system claims.	0.20	188.80
S. D. Greenspan	03/15/23	Correspondence with UCC counsel re: notification of post-confirmation tort system CVA claims (.2); correspondence with J. Weber re: response to Chubb request for notification protocol for post-confirmation tort system CVA claims (.4); review Chubb's proposed revisions to the Disclosure Statement and Madison's draft further revisions in response to same (.4); correspondence with J. Weber re: recommended response to Chubb's revisions (.2).	1.20	1,132.80
S. D. Greenspan	03/17/23	Correspondence with insurers re: revised Plan and Disclosure Statement (.2); correspondence with UCC re: draft Plan and Disclosure Statement (.2).	0.40	377.60

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

April 11, 2023
Invoice No. 8527064
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	03/21/23	Review draft solicitation motion (.7); correspondence with PW team and UCC re: same (.2).	0.90	849.60
S. D. Greenspan	03/23/23	Correspondence with L. Varga re: review of insurance-related documents to be produced to RU.	0.20	188.80
S. D. Greenspan	03/24/23	Telephone conference with L. Varga re: setting up privilege review of insurer communications for production to the Trust (.2); review correspondence from counsel for AIG and attached suggested revisions by AIG to the Disclosure Statement (.7); correspondence with UCC re: draft allocation protocol (.2).	1.10	1,038.40
S. D. Greenspan	03/25/23	Correspondence with L. Liberman re: Chubb communications (.3); correspondence with PW and Pillsbury teams re: response to AIG's proposed revisions to the Disclosure Statement (.2).	0.50	472.00
S. D. Greenspan	03/27/23	Correspondence with UCC re: Committee Support Letter and list of notice parties that intend to pursue abuse claims.	0.30	283.20
S. D. Greenspan	03/27/23	Correspondence and conference with J. Jean re: Chubb and restructuring issues.	0.30	283.20
S. D. Greenspan	03/28/23	Correspondence with insurer counsel re: notice for Plan and Disclosure Statement and further comments to same (.2); correspondence with UCC re: comments on draft Plan and Solicitation Motion and re: RU Claim Objection (.2); review and analyze proposed trust agreement that will govern the Compensation Trustee's administration of the Trust and review Trust Allocation Protocol (.4).	0.80	755.20
S. D. Greenspan	03/29/23	Review revisions to Allocation Protocol and review correspondence re: sale (.6); correspondence with UCC and PW team re: scheduling a conference re: same (.2); review draft Committee Plan Support letter (.2).	1.00	944.00

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

April 11, 2023
 Invoice No. 8527064
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	03/31/23	Correspondence with L. Varga re: access to Relativity for document review of insurance correspondence for production (.2); correspondence re: revisions to the Committee Support Letter and re: Child Safety Procedure (.2).	0.40	377.60
Subtotal Task: 709 - Plan and Disclosure Statement			37.60	\$33,829.20
Total:			61.80	\$ 51,900.10

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	0.60	240.00
702 - Asset Analysis and Recovery	21.70	15,969.60
705 - Fee/Employment Applications	1.00	659.80
707 - Mediation	0.90	1,201.50
709 - Plan and Disclosure Statement	37.60	33,829.20
Total	61.80	\$ 51,900.10

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
P. M. Gillon	0.60	\$1,097.00	\$658.20
J. D. Jean	0.90	1,335.00	1,201.50
Subtotal	1.50		\$1,859.70
Senior Counsel			
S. D. Greenspan	46.90	\$944.00	\$44,273.60
Senior Associate			
A. V. Alfano	0.60	\$833.00	\$499.80
Other Attorney			
B. J. Coffey	3.50	\$442.00	\$1,547.00
Paralegal			
S. Korchinski	9.30	\$400.00	\$3,720.00
Total	61.80		\$51,900.10

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

April 11, 2023
Invoice No. 8527064
Page 11

Total Due For Matter 0000002: \$51,900.10



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

April 11, 2023
Invoice No. 8527064
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 51,900.10	\$ 0.00	\$ 51,900.10
Total This Invoice:	\$ 51,900.10	\$ 0.00	\$ 51,900.10

[Additional remittance information may also be forwarded to accountsreceivable@pillsburylaw.com]



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

May 4, 2023
Invoice No. 8531373
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through April 30, 2023

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 39,331.40	\$ 0.00	\$ 39,331.40
Total This Invoice:	\$ 39,331.40	\$ 0.00	\$ 39,331.40

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

May 4, 2023
Invoice No. 8531373
Page 2

Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through April 30, 2023

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
S. Korchinski	04/03/23	Revise document collection to include recent correspondence.	3.60	\$1,440.00
S. Korchinski	04/20/23	Revise document collection to include recent correspondence and court filings (.6); review email and document collection for information re: how insurer communications were provided to Paul Weiss for review (.2); draft email advising Paul Weiss team of production of documents in native form (.1).	0.90	360.00
Subtotal Task: 701 - Case Administration			4.50	\$1,800.00
<u>Task: 705 - Fee/Employment Applications</u>				
A. V. Alfano	04/04/23	Review and revise second interim fee application.	1.00	\$833.00
Subtotal Task: 705 - Fee/Employment Applications			1.00	\$833.00
<u>Task: 707 - Mediation</u>				
S. D. Greenspan	04/24/23	Conference with J. Jean re: bankruptcy and insurance coverage issues.	0.40	\$377.60
J. D. Jean	04/24/23	Confer with S. Greenspan re: BK and coverage issues.	0.40	534.00
Subtotal Task: 707 - Mediation			0.80	\$911.60
<u>Task: 708 - Claims Administration and Objections</u>				

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

May 4, 2023
Invoice No. 8531373
Page 3

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	04/17/23	Review documents for privilege and responsiveness for potential production to Rockefeller University (4.6); conference with PW team re: same (.8).	5.40	\$5,097.60
S. D. Greenspan	04/18/23	Review documents for privilege and responsiveness for potential production to Rockefeller University (8.1); correspondence with PW team re: privilege issues in connection with same (.3) correspondence with L. Varga re: status of review (.2).	8.60	8,118.40
S. D. Greenspan	04/20/23	Review documents for privilege and responsiveness for potential production to Rockefeller University (7.9); correspondence with PW team re: technical issues with document review and solutions (.4).	8.30	7,835.20
S. D. Greenspan	04/21/23	Correspondence with PW team re: technical issues with document review and solutions.	0.30	283.20
S. D. Greenspan	04/25/23	Correspondence with PW team re: resolution to technical issues with document review.	0.30	283.20
Subtotal Task: 708 - Claims Administration and Objections			22.90	\$21,617.60
<u>Task: 709 - Plan and Disclosure Statement</u>				
S. D. Greenspan	04/03/23	Correspondence with PW team re: draft objection to Rockefeller Proof of Claim and review draft Proof of Claim (1.6); review all draft Plan document to be filed on April 12 and correspondence with UCC and PW team re: same (1.3).	2.90	\$2,737.60
B. J. Coffey	04/05/23	Review proposed insurance policy list for accuracy for use in Reorganization Plan documents (.2); correspondence with S. Greenspan re: same (.2).	0.40	176.80

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

May 4, 2023
Invoice No. 8531373
Page 4

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	04/05/23	Correspondence with PW team re: review of insurance correspondence for production to Trustee (.2); correspondence with PW team re: review of draft list of Abuse Insurance Policies to attach to the Plan documents (.2); correspondence with B. Coffey and M. Pierro re: same (.4); correspondence with S. Hasan re: potential revision to the Disclosure Statement re: defense cost reimbursement (.2); review and analyze draft disclosure statement re: same and strategize re: potential revisions (.2); correspondence with UCC re: Plan (.2).	1.40	1,321.60
S. D. Greenspan	04/06/23	Review draft list of Abuse Insurance Policies attached to the Plan documents in connection with response to PW request and review prior list of policies (.4); correspondence with UCC re: draft Plan (.2); review UCC's proposed revisions to the Plan (.4); correspondence with PW team re: same (.2); correspondence with UCC re: Compensation Trust Agreement and draft Allocation Protocol (.2); review and analyze the UCC's proposed revisions to the Allocation Protocol (.3).	1.70	1,604.80
P. M. Gillon	04/07/23	Review and analyze draft Reorganization Plan documents and correspondence.	0.70	767.90
S. D. Greenspan	04/07/23	Correspondence with PW team re: review of draft list of Abuse Insurance Policies to attach to the Plan documents and re: review of draft channeling injunction language in the Plan (.2); review and analyze draft channeling injunction language (.3); correspondence with UCC re: draft Allocation Protocol (.2); review revised Plan and Trust Allocation Protocol (.4).	1.10	1,038.40

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

May 4, 2023
Invoice No. 8531373
Page 5

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	04/10/23	Correspondence with PW team re: review of insurer correspondence for production (.2); review latest draft of Plan, Disclosure Statement and Rockefeller Claim Objection (.6); correspondence with J. Jean, PW team and UCC re: same (.2); review correspondence with insurers and insurer counsel re: draft Plan and Disclosure Statement (.2).	1.20	1,132.80
J. D. Jean	04/10/23	Review emails re: draft Reorganization Plan and confer with S. Greenspan re: same.	0.30	400.50
S. D. Greenspan	04/11/23	Review AIG's proposed revision to the draft Plan and Disclosure Statement.	0.40	377.60
S. D. Greenspan	04/12/23	Review latest draft of Rockefeller Claim Objection (.4); correspondence with PW team and UCC re: same (.2); review UCC's proposed revisions to Allocation Protocol (.3); correspondence with UCC re: same (.2); review UCC's proposed revisions to the Compensation Trust Agreement (.4); correspondence with PW team and UCC re: same (.2); correspondence with UCC and PW team re: final approval re: Plan, Disclosure Statement and other filings (.2); review Solicitation Motion (.3) correspondence with UCC re: same (.2).	2.40	2,265.60
S. D. Greenspan	04/13/23	Correspondence with Pillsbury team re: status of plan submittal/approval and re: potential objections.	0.20	188.80
S. D. Greenspan	04/14/23	Review/analyze filed Plan documents.	0.30	283.20
S. Korchinski	04/14/23	Circulate plan of reorganization and related filings to case team.	0.20	80.00
S. D. Greenspan	04/17/23	Review correspondence with UCC re: Plan (.2).	0.20	188.80
S. D. Greenspan	04/25/23	Review proposed stipulation to resolve the RU Proof of Claim (.2); correspondence with UCC and PW team re: same (.2).	0.40	377.60
S. D. Greenspan	04/26/23	Correspondence with UCC and PW team re: draft RU Proof of Claim Stipulation.	0.20	188.80
Subtotal Task: 709 - Plan and Disclosure Statement			14.00	\$13,130.80
Pillsbury Winthrop Shaw Pittman LLP				

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

May 4, 2023
Invoice No. 8531373
Page 6

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 711 - Court Hearings</u>				
S. D. Greenspan	04/27/23	Attend disclosure statement hearing (.9); correspondence with PW team re: same (.2).	1.10	\$1,038.40
Subtotal Task: 711 - Court Hearings			1.10	\$1,038.40
Total:			44.30	\$ 39,331.40

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	4.50	1,800.00
705 - Fee/Employment Applications	1.00	833.00
707 - Mediation	0.80	911.60
708 - Claims Administration and Objections	22.90	21,617.60
709 - Plan and Disclosure Statement	14.00	13,130.80
711 - Court Hearings	1.10	1,038.40
Total	44.30	\$ 39,331.40

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
P. M. Gillon	0.70	\$1,097.00	\$767.90
J. D. Jean	0.70	1,335.00	934.50
Subtotal	1.40		\$1,702.40
Senior Counsel			
S. D. Greenspan	36.80	\$944.00	\$34,739.20
Senior Associate			
A. V. Alfano	1.00	\$833.00	\$833.00
Other Attorney			
B. J. Coffey	0.40	\$442.00	\$176.80
Paralegal			
S. Korchinski	4.70	\$400.00	\$1,880.00
Total	44.30		\$39,331.40

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

May 4, 2023
Invoice No. 8531373
Page 7

Timekeeper

Hours

Rate

Value Billed

Total Due For Matter 0000002:

\$39,331.40



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

May 4, 2023
Invoice No. 8531373
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 39,331.40	\$ 0.00	\$ 39,331.40
Total This Invoice:	\$ 39,331.40	\$ 0.00	\$ 39,331.40

Payable in U.S. Dollars upon receipt.

Payment Options:

For payment by mail, remit to: Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to:

Please include our client, matter and invoice number for proper credit.

[Additional remittance information may also be forwarded to accountsreceivable@pillsburylaw.com]



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

June 12, 2023
Invoice No. 8538461
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through May 31, 2023

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 14,327.60	\$ 0.00	\$ 14,327.60
Total This Invoice:	\$ 14,327.60	\$ 0.00	\$ 14,327.60

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

June 12, 2023
Invoice No. 8538461
Page 2

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

June 12, 2023
 Invoice No. 8538461
 Page 3

Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through May 31, 2023

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
S. Korchinski	05/01/23	Revise document collection to include recent correspondence.	0.40	\$160.00
S. Korchinski	05/03/23	Receipt and download of proposed document production to Rockefeller University for attorney review.	0.20	80.00
S. Korchinski	05/19/23	Revise document collection to include recent correspondence and court filings.	0.10	40.00
Subtotal Task: 701 - Case Administration			0.70	\$280.00

Task: 702 - Asset Analysis and Recovery

S. D. Greenspan	05/10/23	Review correspondence from Allianz responding to March 27, 2023 letter and strategize re: response (including review of prior correspondence with Allianz in connection with same (1.4); correspondence and conference with L. Varga re: same (.4).	1.80	\$1,699.20
S. D. Greenspan	05/15/23	Review and analyze prior insurer correspondence to check status of response to requests.	1.90	1,793.60
S. Korchinski	05/15/23	Prepare additional insurer correspondence for review and production by Paul Weiss.	0.20	80.00
Subtotal Task: 702 - Asset Analysis and Recovery			3.90	\$3,572.80

Task: 705 - Fee/Employment Applications

S. Korchinski	05/02/23	Draft 10th monthly fee statement.	0.20	\$80.00
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Client No: 055278
Matter No: 0000002
Michael Kosnitzky

June 12, 2023
Invoice No. 8538461
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
A. V. Alfano	05/09/23	Review monthly fee application (0.4); email to S. Korchinski re same (0.1).	0.50	416.50
A. V. Alfano	05/15/23	Emails with S. Greenspan and S. Korchinski re UST comments to interim compensation application (0.1, 0.1, 0.1).	0.30	249.90

Subtotal Task: 705 - Fee/Employment Applications	1.00	\$746.40
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Task: 708 - Claims Administration and Objections

S. Korchinski	05/10/23	Review and organize supplemental insurer correspondence collection requested by Paul Weiss.	1.20	\$480.00
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Subtotal Task: 708 - Claims Administration and Objections	1.20	\$480.00
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Task: 709 - Plan and Disclosure Statement

S. D. Greenspan	05/02/23	Review and analyze draft Plan Supplement and Compensation Trust Note (.3); review correspondence with UCC re: same (.2); review revised RU claims stipulation (.2); correspondence with UCC re: same (.2).	0.90	\$849.60
S. D. Greenspan	05/11/23	Review revised RU claims stipulation (.3); correspondence with UCC re: same (.2).	0.50	472.00
S. D. Greenspan	05/12/23	Review revised RU claims stipulation (.2); correspondence with UCC re: same (.2).	0.40	377.60
S. D. Greenspan	05/30/23	Review revised draft Plan and allocation protocol (.9); review correspondence with Chubb's counsel re: same (.2).	1.10	1,038.40

Subtotal Task: 709 - Plan and Disclosure Statement	2.90	\$2,737.60
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Task: 710 - Litigation

S. D. Greenspan	05/02/23	Confer with J. Jean re: UCC correspondence and re: RU.	0.20	\$188.80
J. D. Jean	05/02/23	Confer with S. Greenspan re: RU and UCC correspondence.	0.20	267.00

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

June 12, 2023
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	05/04/23	Confer with J. Jean re: insurer correspondence and production to RU.	0.60	566.40
S. D. Greenspan	05/04/23	Correspondence with L. Varga re: review of insurer correspondence for production and strategy for same (.3); review proposed production to RU for privilege and quality issues (1.4); correspondence with PW team re: same (.7).	2.40	2,265.60
J. D. Jean	05/04/23	Confer with S. Greenspan re: RU production and insurer correspondence.	0.60	801.00
S. D. Greenspan	05/09/23	Confer with J. Jean re: privilege issues in the production to RU.	0.20	188.80
S. D. Greenspan	05/09/23	Review additional documents to be produced to RU for privilege (.2); correspondence with PW team re: same (.2).	0.40	377.60
J. D. Jean	05/09/23	Confer with S. Greenspan re: privilege issues.	0.20	267.00
S. D. Greenspan	05/10/23	Telephone conference with L. Varga re: production of insurer correspondence (.4); correspondence with S Korchinski re: production of insurer correspondence (.2).	0.60	566.40
S. D. Greenspan	05/15/23	Correspondence with S Korchinski re: production of insurer correspondence.	0.20	188.80
S. D. Greenspan	05/19/23	Correspondence with PW team re: additional documents to review for production.	0.20	188.80
S. D. Greenspan	05/22/23	Confer with J. Jean re: document production to RU.	0.20	188.80
S. D. Greenspan	05/22/23	Correspondence with PW team re: additional documents to review for production.	0.20	188.80
J. D. Jean	05/22/23	Confer with S. Greenspan re: document production.	0.20	267.00
Subtotal Task: 710 - Litigation			6.40	\$6,510.80
Total:			16.10	\$ 14,327.60

Time Summary By Task

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

June 12, 2023
 Invoice No. 8538461
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<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	0.70	280.00
702 - Asset Analysis and Recovery	3.90	3,572.80
705 - Fee/Employment Applications	1.00	746.40
708 - Claims Administration and Objections	1.20	480.00
709 - Plan and Disclosure Statement	2.90	2,737.60
710 - Litigation	6.40	6,510.80
Total	16.10	\$ 14,327.60

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
J. D. Jean	1.20	\$1,335.00	\$1,602.00
Senior Counsel			
S. D. Greenspan	11.80	\$944.00	\$11,139.20
Senior Associate			
A. V. Alfano	0.80	\$833.00	\$666.40
Paralegal			
S. Korchinski	2.30	\$400.00	\$920.00
Total	16.10		\$14,327.60

Total Due For Matter 0000002: \$14,327.60



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

June 12, 2023
Invoice No. 8538461
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 14,327.60	\$ 0.00	\$ 14,327.60
Total This Invoice:	\$ 14,327.60	\$ 0.00	\$ 14,327.60

Payable in U.S. Dollars upon receipt.

Payment Options:

For payment by mail, remit to: Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to:

Please include our client, matter and invoice number for proper credit.

[Additional remittance information may also be forwarded to accountsreceivable@pillsburylaw.com]



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

July 17, 2023
Invoice No. 8544446
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through June 30, 2023

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 48,967.20	\$ 0.00	\$ 48,967.20
Total This Invoice:	\$ 48,967.20	\$ 0.00	\$ 48,967.20

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

July 17, 2023
Invoice No. 8544446
Page 2

Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through June 30, 2023

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
S. Korchinski	06/21/23	Revise document collection to include recent correspondence.	0.30	\$120.00
S. Korchinski	06/26/23	Revise document collection to include recent correspondence.	0.70	280.00
S. Korchinski	06/27/23	Revise document collection to include recent correspondence.	1.10	440.00
Subtotal Task: 701 - Case Administration			2.10	\$840.00

Task: 702 - Asset Analysis and Recovery

S. D. Greenspan	06/01/23	Correspondence with insurer counsel re: claim status.	0.20	\$188.80
S. D. Greenspan	06/02/23	Review and analyze prior insurer correspondence in connection with ensuring response to outstanding inquiries.	1.70	1,604.80
S. D. Greenspan	06/05/23	Review and analyze latest coverage position letter from Chubb/strategize re: response (.4); review and analyze caselaw cited in Chubb coverage position letter (.8); confer with J. Jean re: Chubb (NC).	1.20	1,132.80
S. D. Greenspan	06/12/23	Correspondence with B. Baker re: response to Chubb coverage position letter re: FK invoices.	0.20	188.80
S. D. Greenspan	06/12/23	Conference with J. Jean re: results of New York research re: control of defense when insurer reserves its rights.	0.20	188.80
S. D. Greenspan	06/13/23	Correspondence with B. Baker re: response to insurer correspondence from Chubb's counsel.	0.20	188.80

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

July 17, 2023
Invoice No. 8544446
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	06/15/23	Review and analyze defense information provided by Friedman Kaplan in connection with response to Chubb inquiry and review Chubb coverage correspondence in connection with same.	4.70	4,436.80
S. Korchinski	06/15/23	Review correspondence for acceptance or denial of coverage by Chubb re: the Ligouri, M.H., C.M., and E. Tolfani litigations or claims.	2.10	840.00
S. D. Greenspan	06/16/23	Review and analyze Chubb correspondence and Chubb defense-related documents/complaints in connection with response to Chubb inquiries.	2.20	2,076.80
S. D. Greenspan	06/22/23	Correspondence with Pillsbury team re: mediation of abuse claims.	0.20	188.80
S. D. Greenspan	06/27/23	Review outstanding insurer correspondence from AIG, Chubb, Swiss Re and Allianz and re: requests for information in connection with potential responses.	2.60	2,454.40
Subtotal Task: 702 - Asset Analysis and Recovery			15.50	\$13,489.60
<u>Task: 705 - Fee/Employment Applications</u>				
S. Korchinski	06/15/23	Draft 11th monthly fee statement.	0.80	\$320.00
A. V. Alfano	06/16/23	Review 11th monthly fee statement (.1); email S. Korchinski issue with respect to same (.1).	0.20	166.60
Subtotal Task: 705 - Fee/Employment Applications			1.00	\$486.60
<u>Task: 709 - Plan and Disclosure Statement</u>				
J. D. Jean	06/05/23	Confer with S. Greenspan re: Chubb strategy and response.	0.40	\$534.00

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

July 17, 2023
 Invoice No. 8544446
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	06/07/23	Review and analyze correspondence from and with Mark Plevin, counsel for Chubb, re: insurers' suggested revisions to the Plan and strategize re: response to same (1.7); correspondence with PW team re: same including drafting of responses to Chubb's suggested revisions (.9); confer re: same with J. Jean (.3).	2.90	2,737.60
J. D. Jean	06/07/23	Confer with S. Greenspan re: Plan and Chubb.	0.30	400.50
S. D. Greenspan	06/08/23	Review correspondence with M. Plevin re: responses to Chubb's requested revisions to the Plan.	0.40	377.60
S. D. Greenspan	06/09/23	Prepare for and attend telephone conference with insurer counsel and J. Weber re: negotiations re: confirmation plan (1.4); telephone conference with J. Weber re: same (.1); correspondence with J. Jean re: same (.2); review New York caselaw re: right to independent counsel in connection with insurer requests re: defense post-reorganization (2.9); review and analyze Chubb's proposed revision to the Plan re: selection and control of defense counsel (.3); correspondence with UCC re: same (.2); conference with UCC in connection with same (.2); correspondence with M. Plevin and J. Weber re: additional revisions to the First Amended Plan (.3).	5.60	5,286.40
S. D. Greenspan	06/09/23	Confer with J. Jean re: conference with M. Plevin on behalf of Chubb, non-objection to plan and illegality of its request to appoint defense counsel (.3); confer with J. Jean re: messaging to UCC re: Chubb attempt to control defense (.3).	0.60	566.40

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

July 17, 2023
 Invoice No. 8544446
 Page 5

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	06/09/23	Confer with S. Greenspan re: conference with M. Plevin on behalf of Chubb, non-objection to plan and request to appoint defense counsel as being contrary to law and ROR (.3); confer with S. Greenspan re: messaging to UCC re: Chubb attempt to select defense counsel and negative ramifications of same (.3); confer with S. Greenspan re: J. Weber and Chubb re: Plan (.2).	0.80	1,068.00
S. D. Greenspan	06/12/23	Telephone conference with UCC re: reorganization plan negotiations (.2); correspondence with UCC re: same (.2); review revisions to the Plan and Trust Allocation Protocol and review correspondence to UCC re: same and re: Chubb's suggested revisions to Plan re: selection/control of defense counsel (.4); correspondence with J. Weber re: preparation of response to Chubb's suggested revisions to Plan re: selection/control of defense counsel (.2); prepare response to Chubb's suggested revisions to Plan re: selection/control of defense counsel and strategize re: same (1.4); correspondence with PW team re: draft of same (.2); research New York caselaw re: right to independent counsel when insurer agrees to defend under a reservation of rights (in connection with the foregoing) (1.2); review M. Plevin's response to my prior email re: selection of defense counsel and control of defense and strategize re: response (.8); correspondence with PW team re: response to M. Plevin's email (.3); correspondence with UCC re: M. Plevin email (.2).	5.10	4,814.40
J. D. Jean	06/12/23	Review correspondence re: Chubb's position on independent counsel and confer with S. Greenspan re: research re: NY law re: same.	0.40	534.00

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

July 17, 2023
 Invoice No. 8544446
 Page 6

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	06/13/23	Correspondence with PW team and insurer counsel re: scheduling group call re: control of defense issue (.2); prepare for and attend conference call with UCC counsel, PW team and counsel for Chubb re: Plan negotiations (1.2); telephone conference with J. Weber re: control of defense issues in Plan (.2); telephone conference with UCC counsel re: same (.2); review and analyze the UCC's latest suggested revisions to the First Amended Plan (.4); correspondence with PW team re: same (.2); correspondence with PW team, insurer counsel and UCC re: extension of time to file objections to the Plan and re: insurer call (.4); review and analyze latest revisions to the Plan and Trust Allocation reflecting the parties' dismissions (.4).	3.20	3,020.80
S. D. Greenspan	06/14/23	Prepare for and attend conference with UCC counsel re: control of the defense issues and re: negotiation of the plan; (.4); research New York law re: ability of insurers that defend under a reservation of rights to recover defense costs (3.3); prepare memorandum re: same (1.2); correspondence with counsel for Chubb and with the UCC and PW team re: status of resolution of open issues in the plan negotiations (.2); review and analyze correspondence from bankruptcy counsel for Chubb and annexed proposed revisions by Chubb to the plan including re: control of defense issues and strategize re: response to same (.6); correspondence with PW team re: response to Chubb's proposed revisions to the Plan (.3); correspondence with UCC re: same (.2).	6.20	5,852.80

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

July 17, 2023
 Invoice No. 8544446
 Page 7

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	06/15/23	Review the UCC's proposed revisions to the Plan in response to Chubb's proposed revisions to the plan and review the UCC's correspondence to Chubb's counsel M. Plevin and to J. Weber re: same (.6); review and analyze further negotiation emails between J. Lucas and M. Plevin re: same (.3); review and analyze further revised Plan as revised by Debtor's counsel in connection with the above negotiations (.5); correspondence with L. Lieberman re: same (.2).	1.60	1,510.40
J. D. Jean	06/15/23	Review correspondence re: coverage for claims.	0.60	801.00
S. D. Greenspan	06/16/23	Review and analyze further revise Plan (1.2); correspondence with PW team, J. Lucas and M. Plevin re: same (.2)	1.40	1,321.60
S. D. Greenspan	06/22/23	Telephone conference with M. Plevin re: mediation motion and correspondence with PW team re: same.	0.20	188.80
J. D. Jean	06/22/23	Confer with S. Greenspan re: mediation of abuse claims.	0.10	133.50
S. D. Greenspan	06/29/23	Review further revised draft Plan, Trust Agreement and Allocation Protocol and accompanying correspondence to M. Plevin.	0.90	849.60
S. D. Greenspan	06/30/23	Correspondence with J. Weber and M. Plevin re: confirmation hearing and Plan negotiations.	0.20	188.80
Subtotal Task: 709 - Plan and Disclosure Statement			30.90	\$30,186.20
<u>Task: 710 - Litigation</u>				
S. D. Greenspan	06/06/23	Correspondence with PW team re: review of insurer correspondence for production.	0.20	\$188.80
S. D. Greenspan	06/07/23	Review documents for responsiveness and privilege for production (3.6); correspondence with PW team re: same (.2).	3.80	3,587.20

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

July 17, 2023
 Invoice No. 8544446
 Page 8

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	06/14/23	Correspondence with L. Varga re: review and production of insurer correspondence to respond to discovery requests.	0.20	188.80
Subtotal Task: 710 - Litigation			4.20	\$3,964.80
Total:			53.70	\$ 48,967.20

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	2.10	840.00
702 - Asset Analysis and Recovery	15.50	13,489.60
705 - Fee/Employment Applications	1.00	486.60
709 - Plan and Disclosure Statement	30.90	30,186.20
710 - Litigation	4.20	3,964.80
Total	53.70	\$ 48,967.20

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
J. D. Jean	2.60	\$1,335.00	\$3,471.00
Senior Counsel			
S. D. Greenspan	45.90	\$944.00	\$43,329.60
Senior Associate			
A. V. Alfano	0.20	\$833.00	\$166.60
Paralegal			
S. Korchinski	5.00	\$400.00	\$2,000.00
Total	53.70		\$48,967.20

Total Due For Matter 0000002: \$48,967.20



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

July 17, 2023
Invoice No. 8544446
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 48,967.20	\$ 0.00	\$ 48,967.20
Total This Invoice:	\$ 48,967.20	\$ 0.00	\$ 48,967.20

Payable in U.S. Dollars upon receipt.

Payment Options:

For payment by mail, remit to: Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to: JP Morgan Chase Bank NA, NY, NY; for credit to Pillsbury Winthrop Shaw Pittman LLP, Account .

Please include our client, matter and invoice number for proper credit.

[Additional remittance information may also be forwarded to accountsreceivable@pillsburylaw.com]



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

August 15, 2023
Invoice No. 8549488
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through July 31, 2023

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 15,384.20	\$ 0.00	\$ 15,384.20
Total This Invoice:	\$ 15,384.20	\$ 0.00	\$ 15,384.20

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

August 15, 2023
Invoice No. 8549488
Page 2

Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through July 31, 2023

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 702 - Asset Analysis and Recovery</u>				
S. D. Greenspan	07/13/23	Review correspondence from Argo re: loss portfolio transfer re: claims with certain loss dates (.2); correspondence with J. Dold and PW team re: same (.2).	0.40	\$377.60
J. D. Jean	07/13/23	Review Argo correspondence.	0.10	133.50
Subtotal Task: 702 - Asset Analysis and Recovery			0.50	\$511.10
<u>Task: 705 - Fee/Employment Applications</u>				
S. Korchinski	07/17/23	Draft 12th monthly fee statement.	0.30	\$120.00
A. V. Alfano	07/18/23	Review June monthly fee statement (0.2); emails with S. Korchinski in respect of same (0.1).	0.30	249.90
S. Korchinski	07/18/23	Draft 12th monthly fee statement.	0.40	160.00
Subtotal Task: 705 - Fee/Employment Applications			1.00	\$529.90
<u>Task: 709 - Plan and Disclosure Statement</u>				
S. D. Greenspan	07/03/23	Confer with J. Jean re: Chubb's positions and the UCC's positions on defense of abuse claims.	0.40	\$377.60
J. D. Jean	07/03/23	Confer with S. Greenspan re: update on Chubb's positions and Committees' position re: Chubb's appointed/defense counsel.	0.40	534.00

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

August 15, 2023
Invoice No. 8549488
Page 3

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	07/05/23	Correspondence with counsel for Chubb re: Chubb's intent not to object to the Plan or proposed confirmation order (.2); correspondence with Pillsbury team re: same (.2); correspondence with T. McChristian and J. Dold re: Chubb's response to the draft Plan and confirmation order (.2); confer with J. Jean re: objections to the Plan and Chubb position in connection with same (.3).	0.90	849.60
J. D. Jean	07/05/23	Confer with S. Greenspan re: objections to plan and Chubb's position re: same.	0.30	400.50
S. D. Greenspan	07/10/23	Correspondence with PW team re: confirmation hearing.	0.20	188.80
S. D. Greenspan	07/11/23	Correspondence with J. Weber re: potential RU settlement.	0.20	188.80
S. D. Greenspan	07/12/23	Correspondence with J. Weber re: insurance issues arising from potential settlement with Rockefeller University (.4); conference with J. Weber re: same (.2); strategize and analyze insurance impacts of potential settlement with Rockefeller (.6); correspondence with J. Weber re: notice to insurers of potential RU settlement (.2); confer with J. Jean re: same (.2).	1.60	1,510.40
J. D. Jean	07/12/23	Review correspondence re: confirmation hearing and no objection by Chubb (.1); review correspondence re: Rockefeller University settlement and possible insurance issues and notice (.4); confer with S. Greenspan re: same (.2).	0.70	934.50
S. D. Greenspan	07/13/23	Review correspondence with J. Weber and M. Plevin re: potential Rockefeller University settlement.	0.20	188.80
S. D. Greenspan	07/17/23	Correspondence with Pillsbury team re: Rockefeller settlement.	0.20	188.80
J. D. Jean	07/17/23	Correspondence with S. Greenspan re: Rockefeller University settlement.	0.10	133.50

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

August 15, 2023
Invoice No. 8549488
Page 4

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
S. D. Greenspan	07/19/23	Review correspondence to insurers re: proposed settlement with Rockefeller University (.2); correspondence with Paul Weiss and Friedman Kaplan teams re: sharing the Direct Abuse Claim Discovery with the Abuse Insurance Companies and re: coordinating a meeting with the insurers re: same (.9); review the draft Plan in connection with same (.6); correspondence with insurers re: meeting to discuss production of the Direct Abuse Claim Discovery pursuant to the Plan (.4).	2.10	1,982.40
S. D. Greenspan	07/20/23	Telephone conference with J. Weber re: AIG objections to plan (.2); review correspondence with insurers re: proposed settlement with Rockefeller University and insurer comments (.2); correspondence with insurers re: meeting to discuss production of the Direct Abuse Claim Discovery pursuant to the Plan (.2).	0.60	566.40
S. D. Greenspan	07/21/23	Telephone conference with J. Weber re: AIG objections to plan (.2); correspondence with insurers re: meeting to discuss production of the Direct Abuse Claim Discovery pursuant to the Plan (.3).	0.50	472.00
S. D. Greenspan	07/24/23	Correspondence with PW team re: correspondence with insurers re: meeting to discuss production of the Direct Abuse Claim Discovery pursuant to the Plan (.2); correspondence with counsel for Chubb re: Chubb's appointment of defense counsel for the abuse cases despite agreement with the UCC to postpone that issue under post-confirmation (.2); strategize re: response to same (.4); correspondence with PW team re: response to same (.3); correspondence with insurers re: meeting to discuss production of the Direct Abuse Claim Discovery pursuant to the Plan (.3); prepare correspondence to Chubb's counsel L. Klein responding to Chubb's appointment of panel counsel to defend the abuse cases (.6); correspondence with L. Klein re: same (.2).	2.20	2,076.80

Client No: 055278
 Matter No: 0000002
 Michael Kosnitzky

August 15, 2023
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<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
J. D. Jean	07/24/23	Review correspondence re: productions and appointment of defense counsel (.2); strategy with S. Greenspan re: same and response to L. Klein (.4).	0.60	801.00
S. D. Greenspan	07/25/23	Prepare for and attend call with insurers regarding transfer of abuse claim discovery (1.6); correspondence with B. Baker re: production of Abuse Claim Discovery (.2).	1.80	1,699.20
S. D. Greenspan	07/27/23	Confer with J. Jean re: coverage for abuse claims.	0.30	283.20
J. D. Jean	07/27/23	Confer with S. Greenspan re: coverage for abuse claims.	0.30	400.50

Subtotal Task: 709 - Plan and Disclosure Statement	13.60	\$13,776.80
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Task: 711 - Court Hearings

S. D. Greenspan	07/17/23	Attend status conference and prepare for same.	0.60	\$566.40
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Subtotal Task: 711 - Court Hearings	0.60	\$566.40
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Total:	15.70	\$ 15,384.20
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Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
702 - Asset Analysis and Recovery	0.50	511.10
705 - Fee/Employment Applications	1.00	529.90
709 - Plan and Disclosure Statement	13.60	13,776.80
711 - Court Hearings	0.60	566.40
Total	15.70	\$ 15,384.20

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Partner			
J. D. Jean	2.50	\$1,335.00	\$3,337.50

Senior Counsel

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

August 15, 2023
Invoice No. 8549488
Page 6

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
S. D. Greenspan	12.20	\$944.00	\$11,516.80
Senior Associate			
A. V. Alfano	0.30	\$833.00	\$249.90
Paralegal			
S. Korchinski	0.70	\$400.00	\$280.00
Total	15.70		\$15,384.20

Total Due For Matter 0000002: \$15,384.20



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

August 15, 2023
Invoice No. 8549488
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 15,384.20	\$ 0.00	\$ 15,384.20
Total This Invoice:	\$ 15,384.20	\$ 0.00	\$ 15,384.20

Payable in U.S. Dollars upon receipt.

Payment Options:

For payment by mail, remit to: Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to: JP Morgan Chase Bank NA, NY, NY **REDACTED**

Please include our client, matter and invoice number for proper credit.

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Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

September 18, 2023
Invoice No. 8554952
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

For Professional Services Rendered and Disbursements Incurred through August 21, 2023

<u>Matter Name</u>	<u>Services</u>	<u>Disbursements</u>	<u>Balance Due</u>
Insurance Recovery	\$ 1,286.60	\$ 0.00	\$ 1,286.60
Total This Invoice:	\$ 1,286.60	\$ 0.00	\$ 1,286.60

Current charges only. Time and disbursements not yet recorded will be included in future invoices.

Pillsbury Winthrop Shaw Pittman LLP
600 Brickell Avenue, Suite 3100 - Miami, FL - 33131
Due Upon Receipt
Remittance Address
P.O. Box 30769 . New York, NY 10087-0769

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

September 18, 2023
Invoice No. 8554952
Page 2

Insurance Recovery

For Professional Services Rendered and Disbursements Incurred Through August 21, 2023

Time Detail By Task

<u>Timekeeper</u>	<u>Date</u>	<u>Service</u>	<u>Hours</u>	<u>Amount</u>
<u>Task: 701 - Case Administration</u>				
S. Korchinski	08/03/23	Revise document collection to include recent correspondence.	1.60	\$640.00
S. Korchinski	08/11/23	Revise document collection to include recent correspondence.	0.40	160.00
Subtotal Task: 701 - Case Administration			2.00	\$800.00
<u>Task: 705 - Fee/Employment Applications</u>				
S. Korchinski	08/15/23	Draft thirteenth monthly fee statement (.6); draft third interim and final fee application (.2).	0.80	\$320.00
A. V. Alfano	08/17/23	Review July monthly fee statement and confirm sign off.	0.20	166.60
Subtotal Task: 705 - Fee/Employment Applications			1.00	\$486.60
Total:			3.00	\$ 1,286.60

Time Summary By Task

<u>Task</u>	<u>Hours</u>	<u>Amount</u>
701 - Case Administration	2.00	800.00
705 - Fee/Employment Applications	1.00	486.60
Total	3.00	\$ 1,286.60

Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
Senior Associate			

Client No: 055278
Matter No: 0000002
Michael Kosnitzky

September 18, 2023
Invoice No. 8554952
Page 3

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value Billed</u>
A. V. Alfano	0.20	\$833.00	\$166.60
Paralegal			
S. Korchinski	2.80	\$400.00	\$1,120.00
Total	3.00		\$1,286.60

Total Due For Matter 0000002: \$1,286.60



Tax ID No. 94-1311126

Tim McChristian
Executive Director
Madison Square Boys & Girls Club
250 Bradhurst Ave
New York, NY 10039

September 18, 2023
Invoice No. 8554952
Client No. 055278
Matter No. 0000002
Michael Kosnitzky
(786) 913-4900

Remittance Advice

Enclose this Remittance Advice for Proper Credit

Matter Number	Services	Disbursements	Balance Due
0000002	\$ 1,286.60	\$ 0.00	\$ 1,286.60
Total This Invoice:	\$ 1,286.60	\$ 0.00	\$ 1,286.60

Payable in U.S. Dollars upon receipt.

Payment Options:

For payment by mail, remit to: Pillsbury Winthrop Shaw Pittman LLP, P.O. Box 30769, New York, NY 10087-0769

For Electronic Payments including Wire Transfer, ACH, and SWIFT Payments, send to:

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